

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA
CIVIL DIVISION**

MICHAEL T. FLYNN,

Plaintiff,

Case No. 2023-CA-004264 NC

v.

Division C Circuit

JIM STEWARTSON; RICK WILSON;
AND MEIDASTOUCH, LLC,

Defendants.

_____ /

NOTICE OF FILING HEARING TRANSCRIPT

Defendant, Rick Wilson, gives notice of filing as Exhibit A the transcript of the hearing conducted on January 19, 2024, on Rick Wilson's Motion to Dismiss or in the Alternative Motion for Summary Judgment (DIN 63), and Jim Stewartson's Motion to Dismiss Plaintiff's Second Amended Complaint (DIN 62).

Dated: January 31, 2024.

/s/ Leonard M. Collins

Leonard M. Collins (FBN: 423210)

GRAYROBINSON, P.A.

301 S. Bronough Street, Suite 600

Tallahassee, Florida 32301

Telephone: 850-577-9090

leonard.collins@gray-robinson.com

Attorney for Defendant, Rick Wilson

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been provided to the following via electronic mail on January 31, 2024.

Craig A. Whisenhunt
RIPLEY WHISENHUNT, PLLC
8130 66th Street North, Suite 3
Pinellas Park, Florida 33781
Telephone: 727-256-1660
craiggrwrlawfirm.com
efiling@rightingwrongsflorida.com
Attorneys for Defendant, Jim Stewartson

George K. Randert
George A.D. Thurlow
RANDERT & MORTIMER, PLLC
535 Central Avenue, Suite 200
St. Petersburg, Florida 33701
Telephone: 727-823-4191
grandertarandertlaw.com
service@arandertlaw.com
gthurlow@randertlaw.com
tmccreary@randertlaw.com
Attorneys for Defendant, Jim Stewartson

Jared J. Roberts
BINNALL LAW GROUP, PLLC
717 King Street, Suite 200
Alexandria, Virginia 22314
Telephone: 703-888-1943
jared@binnall.com
Counsel for Plaintiff, Michael T. Flynn

Jonathan R. Huffman
James A. Boatman, Jr.
BOATMAN RICCI
3021 Airport-Pulling Rd. N., Suite 202
Naples, Florida 34105
Telephone: 239-330-1494
courtfilings@boatnmanricci.com
jrh@boatmanricci.com
Attorneys for Plaintiff, Michael T. Flynn

/s/ Leonard M. Collins
Leonard M. Collins (FBN: 423210)
GRAYROBINSON, P.A.

Exhibit A

1 IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
2 IN AND FOR SARASOTA COUNTY, STATE OF FLORIDA
3 CIVIL ACTION

4 MICHAEL T. FLYNN, an
5 individual,

6 Plaintiff, Case No. 2023-CA-004264 NC

7 v.

8 JIM STEWARTSON; RICK
9 WILSON; and MEIDASTOUCH,
10 LLC,

11 Defendants.

12 _____ /

13

14 MOTION HEARING

15

16

17 DATE: January 19, 2024

18 JUDGE: The Honorable Hunter Carroll

19 LOCATION: Judge Silvertooth Judicial Center
20 2002 Ringling Boulevard
21 Sarasota, FL 34237

22 STENOGRAPHER: Lisa Plante, RPR, FPR-C

23

24

25

Job No. 344520

1 APPEARANCES:

2 On Behalf of Plaintiff:

3 BOATMAN RICCI, P.A.
4 12751 New Brittany Boulevard, Suite 402
5 Fort Myers, FL 33907-3669
(239) 330-1494

6 BY: JONATHAN R. HUFFMAN, Esquire
7 jrh@boatmanricci.com

8 On Behalf of Defendant, Jim Stewartson:

9 RIPLEY WHISENHUNT, PLLC
8130 66th Street North, Suite 3
10 Pinellas Park, FL 33781-2111
11 (727) 256-1660

12 BY: CRAIG A. WHISENHUNT, Esquire
craig@rwrlawfirm.com

13 On Behalf of Defendant, Jim Stewartson:

14 RAHDERT & MORTIMER, PLLC
15 535 Central Avenue, Suite 200
16 St. Petersburg, FL 33701
(727) 823-4191

17 BY: GEORGE A. D. THURLOW, Esquire
18 gthurlow@rahdertlaw.com

19 On Behalf of Defendant, Rick Wilson/MeidasTouch, LLC:

20 GRAY-ROBINSON, P.A.
301 South Bronough Street, Suite 600
21 Tallahassee, FL 32301
22 (305) 904-4973

23 BY: LEONARD COLLINS, Esquire
leonard.collins@gray-robinson.com

24

25

1	I N D E X	
2		PAGE
	MOTION HEARING:	
	Argument By Mr. Collins	6
	Argument By Mr. Whisenhunt	27
	Argument By Mr. Huffman	35
	Rebuttal Argument By Mr. Collins	62
	Rebuttal Argument By Mr. Whisenhunt	70
	Rebuttal Argument By Mr. Huffman	74
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

1 [PROCEEDINGS WERE HELD FRIDAY, JANUARY 19, 2024, AT
2 2:00 P.M., IN OPEN COURT.]

3 * * *

4 THE COURT: Please be seated.

5 Okay. Welcome. This is case number
6 2023-CA-4264, Michael Flynn versus Jim Stewartson,
7 Rick Wilson, MeidasTouch, LLC.

8 Starting with plaintiffs, let's take
9 appearances, please.

10 MR. HUFFMAN: Thank you, Your Honor.

11 My name is Jonathan Huffman from the Bowman
12 Ricci Law Firm, and I am honored to represent
13 General Michael Flynn, who it looks like he's with
14 us by Zoom.

15 THE COURT: And any other plaintiff's
16 attorneys that are making an appearance?

17 MR. HUFFMAN: Not at this time, Your Honor.
18 My co-counsel was caught in the snowstorm, and his
19 plane is landing. He may join by Zoom at some
20 point, if that's permitted. But I'll be making
21 the arguments to Your Honor.

22 THE COURT: Defense.

23 MR. WHISENHUNT: Good afternoon, Your
24 Honor. Craig Whisenhunt and George Thurlow
25 appearing in person on behalf of defendant, Jim

1 Stewartson.

2 THE COURT: And are there any --

3 MR. COLLINS: Leonard Collins on behalf of
4 defendant, Rick Wilson.

5 THE COURT: We have our various motions
6 that have been filed with respect to the Amended
7 Complaint. So are we ready to proceed?

8 MR. COLLINS: Your Honor, on behalf of
9 Mr. Wilson, we are ready to proceed.

10 I do want to confirm on the record that
11 both parties are waiving Rule 1.510(b) concerning
12 the timing on a motion for summary judgment. This
13 was addressed during the status conference, and
14 there was an agreement, but I want the record to
15 be plain on this, that we're waiving.

16 Is that correct?

17 MR. HUFFMAN: We understood that under the
18 Anti-SLAPP statute that the defendants were
19 putting evidentiary materials before Your Honor,
20 and I believe the statute says that Your Honor can
21 construe their motion to dismiss as a motion for
22 summary judgment, if necessary; and if, indeed,
23 that is what we're being asked to approve, then
24 there's no objection to that.

25 MR. COLLINS: So long as there's no

1 objection, we're fine to proceed, Your Honor.

2 THE COURT: Okay. Let's proceed.

3 MR. COLLINS: Good afternoon, Your Honor.

4 Leonard Collins on behalf of Rick Wilson.

5 We filed a lengthy motion to dismiss or, in
6 the alternative, a motion for summary judgment.

7 I'd like to go over first the motion to
8 dismiss, keeping the Court's focus on just the
9 four corners of the Complaint, and just arguing
10 the Complaint itself.

11 At paragraph 67 of the Complaint, General
12 Flynn issued a Tweet, and my client reviewed the
13 Tweet and issued a statement of his own. My
14 client's statement is, "Putin employee." The
15 Tweet itself indicates that the White House
16 ignored legitimate concerns on behalf of the
17 Russian government. It indicates that there are
18 legitimate ethnic problems in the Ukraine, blamed
19 the United States for the Russian invasion, and my
20 client, in response to General Flynn's use of his
21 free speech, responded and wrote, "Putin
22 employee," in a Tweet.

23 That is not defamation. It can't be
24 construed as defamation under the circumstances,
25 because it is a public statement on a public

1 issue. And because as Mr. Wilson is entitled to
2 free speech, as General Flynn is entitled to free
3 speech, and so there's nothing within that Tweet
4 that's actionable, just within the four corners of
5 the Complaint.

6 Moreover, the Complaint itself talks about
7 damages, and when the Court looks at the damages
8 claimed in this Complaint, just within the four
9 corners, it concerns items that are outside the
10 four corners of the Complaint, items that were not
11 argued within the Complaint, like the fact that my
12 client apparently switched political beliefs
13 overnight. That's paragraph 34 of the Second
14 Amended Complaint. Like my client founded an
15 organization dedicated to opposing Republicans.
16 That's also paragraph 34 of the Complaint. Like
17 my client spreads lies about conservative figures
18 associated with Donald Trump. That's paragraph 8
19 of the Complaint.

20 THE COURT: You can continue.

21 MR. COLLINS: This Complaint is not about a
22 statement concerning a Putin employee. This
23 Complaint is about what my client does, what my
24 client says. It's an effort to inhibit his
25 speech. So that's just within the four corners of

1 the Complaint.

2 There's another Tweet. Mr. Stewartson
3 re-Tweeted -- I'm sorry -- Mr. Wilson re-Tweeted
4 Mr. Stewartson's Tweet, and if the Court looks at
5 the Tweet, the Tweet says a number of things about
6 Mr. Wilson in his television appearance that
7 mention General Flynn.

8 Within the Tweet, within the Complaint,
9 there is a photograph of my client, and there's a
10 banner under it that talks about the 2024
11 election. This is an election statement. And
12 within that statement that Mr. Stewartson wrote is
13 a statement that -- I believe it's, "Flynn is Q."
14 That's all it says. This is not an actionable
15 statement. That doesn't mean anything. There is
16 nothing within the Complaint that describes, that
17 determines, that argues, what that means and how
18 that's actionable for defamation.

19 On its face, within the four corners of the
20 Complaint, the Court now can make a determination
21 based on the record that this is, in fact, a
22 lawsuit that was filed for the purposes of
23 inhibiting my client's free speech.

24 I want to go through -- I want to go
25 through the motion for summary judgment, because I

1 think that once we take the Court's glare outside
2 of the four corners of this Complaint, it's even
3 more plain in terms of what it is that's happening
4 here.

5 And so what you have is two political --
6 and I'm sorry. I'm just going back to the
7 Complaint for a moment. The Complaint argues that
8 General Flynn served in government. It doesn't
9 talk about the nature and extent of his service,
10 which is interesting, because he's not famous for
11 being the DNI. He is not famous for that;
12 although, that was some level of notoriety, some
13 level of fame. What General Flynn is known for is
14 the fact that he served as the National Security
15 Advisor for the President of the United States for
16 22 days, that he was ultimately indicted, that he
17 ultimately pled, that he signed statements
18 indicating the truthfulness of his plea. There is
19 a wealth of material with regard to that
20 information that is in this record, and the Court
21 can consider that in an Anti-SLAPP motion.

22 Just one moment. We served on the Court,
23 as part of our motion, a statement of undisputed
24 material facts. And I would point out to the
25 Court, and I've asked a couple of times, "Counsel,

1 we all agree, we're here on a motion for summary
2 judgment, correct?" Well, if the Court is going
3 to apply the Rules for a summary judgment motion,
4 which we're going to ask the Court to do, we have
5 submitted a statement of undisputed material
6 facts. General Flynn has not. There is no
7 counter. There is no evidence before this Court
8 that counters any of the material that we have
9 submitted in the record. We have submitted a
10 number of newspaper articles. We've submitted
11 court documents. And we've submitted an Affidavit
12 from Mr. Wilson. All of that is material the
13 Court can consider in support of the motion for
14 summary judgment.

15 Again, we've only got two statements that
16 Mr. Wilson is even accused of promulgating. All
17 right. There's statement one, "Putin employee";
18 and statement two, "Flynn is Q." That's it.
19 That's all Mr. Wilson is accused of having done.

20 In terms of the "Putin employee" statement,
21 I've asked the Court to take judicial notice of
22 these documents, and that's before the Court, and
23 I can go through it one by one if the Court would
24 like.

25 THE COURT: Have you talked to your

1 opposing counsel about whether we're going to take
2 judicial notice or not?

3 MR. COLLINS: My understanding is they
4 oppose the Court taking judicial notice; and so we
5 can take it one at a time, if the Court would like
6 to do that.

7 THE COURT: I mean, it's your time, so you
8 tell me how you want to proceed.

9 MR. COLLINS: Sure. So Exhibit 1 -- I
10 don't know if the Court has the material in front
11 of the Court.

12 THE COURT: Give me half a second, and I
13 will. I'm looking at the other defendant's
14 materials.

15 MR. COLLINS: Let me see if I can assist
16 the Court with the DIN number. Okay. So our
17 motion to dismiss is at DIN 63. And these are the
18 exhibits to that motion.

19 THE COURT: All right.

20 MR. COLLINS: Okay.

21 THE COURT: I'm there.

22 MR. COLLINS: So first things first, Your
23 Honor, Exhibit No. 5. We're not going to ask the
24 Court to take judicial notice of Exhibit No. 5,
25 but I wanted to point it out to the Court. That

1 is Mr. Wilson's Affidavit, and Mr. Wilson's
2 Affidavit refers to exhibits. And the exhibits
3 that his affidavit refers to are the same exhibits
4 that are attached to the motion, and they're
5 numbered in the same way, and they're the same
6 exhibits attached to our motion asking the Court
7 to take judicial notice.

8 So Mr. Wilson's Affidavit talks to the fact
9 that he relied upon the materials that we cite to
10 support his opinion with regard to what he
11 Tweeted. So that's number one.

12 Number two, I'd like to direct the Court to
13 Exhibit No. 1. All right. Exhibit No. 1 is a New
14 York Times editorial that discusses Michael Flynn
15 as an alarming pick for National Security Advisor.
16 It talks about his ties to Russia, and it talks
17 about his engagement with Turkey. It also talks
18 about an article that he wrote in 2016 with regard
19 to the extradition of a Turkish national in the
20 United States.

21 We'd ask the Court to take judicial notice
22 of that article, number one. It ran. There's no
23 question. I don't believe there's a question as
24 to the fact that these are articles that ran in
25 the New York Times. Pursuant to 90.202(12)

1 Florida statutes.

2 In addition, Mr. Wilson mentions that
3 article in his Affidavit. In addition, he relies
4 on it in order to support his opinions concerning
5 General Flynn. I'd ask the Court to take that as
6 evidence pursuant to this hearing.

7 THE COURT: The reality is, unless we're
8 going to go ping-ponging back and forth on every
9 single issue, why don't you just make your
10 argument. I'm not going to make any rulings. I'm
11 going to take everything under advisement, and
12 then I'll get a written ruling out.

13 MR. COLLINS: Fair enough. So as we roll
14 through our statement of undisputed facts, the
15 statement of undisputed facts lays out what
16 General Flynn was reported to have been engaged in
17 over the course of his career. And those items --
18 and, you know, we can talk to the fact that
19 General Flynn was the National Security Advisor of
20 the President of the United States. That makes
21 him a public figure. To the nth degree it makes
22 him a public figure. It makes him a major public
23 figure.

24 THE COURT: I don't think your opponent is
25 disputing that.

1 MR. COLLINS: Well, but their Complaint
2 omits the fact that he served as the National
3 Security Advisor. It omits the fact that he was
4 indicted over his interactions with the Russian
5 government. Their Complaint omits the fact that
6 General Flynn took, according to news reports,
7 \$45,000 from RT, which is the Russian television
8 network. Their Complaint omits the fact that the
9 United States government determined that RT was an
10 entity that was controlled by the Russian
11 government and it was exporting propaganda on
12 behalf of the Russian government.

13 So Mr. Wilson, on the day that Russia
14 invades Ukraine and General Flynn issues a
15 statement defending in part the action and blaming
16 the U.S. government for it, Mr. Wilson is well
17 within his right to say, "Putin employee," in
18 response.

19 And that's the point of these materials.
20 These materials support what Mr. Wilson did.

21 We also cite to an article, which is
22 Exhibits 7 and 8, an article in the publication of
23 The Hill where General Flynn supported and wrote
24 about a Turkish national, and did not disclose the
25 fact that he was, in fact, an agent of the Turkish

1 government. He later did. And The Hill then
2 issued an editorial statement advising its readers
3 of General Flynn's history and the fact that he
4 did not tell readers that he was, in fact, an
5 agent of the Turkish government. We think that's
6 relevant, because it goes to Mr. Wilson's state of
7 mind with regard to informing readers as to what
8 it is that General Flynn's background was in terms
9 of the statement itself.

10 We also have the fact that General Flynn
11 was pardoned by the President of the United
12 States. Again, that supports the fact that he was
13 a major national figure.

14 We also have a number of statements in the
15 Complaint that go to malice that I want to
16 address. There are -- I believe it's
17 paragraph 100 of the Second Amended Complaint that
18 indicates that Mr. Wilson Tweeted, "General Flynn
19 is going to jail." I believe there are eight
20 Tweets that are just stand-alone, "General Flynn
21 is going to jail." Those Tweets address the fact
22 that General Flynn may well have been going to
23 jail. Those are all public record statements
24 about a major national figure who was in the
25 throes of something that is highly unusual.

1 That's all protected speech that can't be used to
2 suggest that somehow my client acted with malice
3 when he indicated that General Flynn was,
4 quote/unquote, a "Putin employee."

5 All of that is relevant, Your Honor. All
6 of it is supported by Mr. Wilson's Affidavit.

7 I want to turn to the second statement,
8 which is the "Flynn is Q" statement. On its face,
9 that is a meaningless statement. The Complaint
10 itself doesn't say that it has any meaning.

11 However, if the Court wants to look outside
12 of the Complaint, the only materials that are here
13 indicate that General Flynn is tied to the QAnon
14 movement, and he's tied in a host of ways. He's
15 tied in taking an oath in public. He's tied in
16 selling merchandise on his website that have the
17 slogan, "Where we go one, we go all," which is --
18 and we cite to case law. There are federal cases
19 that deal with that statement and tie it to QAnon.
20 General Flynn is known for giving speeches behind
21 podiums with that same statement. And there are
22 newspaper article after newspaper article that we
23 have quoted and cited to that indicate and show
24 his relationship with that community.

25 So Mr. Stewartson's Tweet that says, "Flynn

1 is Q," again, meaningless; but also that is
2 ostensibly true. It could have said, "Flynn is
3 Republican." What is Q, in context, in the
4 Complaint? What does that statement mean? The
5 Court and the case law talk to the fact that the
6 Court shouldn't torture itself in order to come up
7 with meaning. "Flynn is Q," on its own, as a
8 statement, it could say, "Flynn is R or Z or X."
9 It doesn't mean anything.

10 THE COURT: Well, so are you suggesting I
11 could consider it as Q from Star Trek, The Next
12 Generation?

13 MR. COLLINS: I believe I did suggest that
14 you could suggest that it's Q, the James Bond
15 character from the James Bond movies.

16 THE COURT: The Quartermaster?

17 MR. COLLINS: It means nothing. On its
18 face -- on its face, within the four corners of
19 the Complaint, and with the evidence before this
20 Court, you've got nothing else, really, to go on
21 in terms of what that means. And so you've got to
22 take a whole host of leaps in order to determine
23 that, really, that means -- first of all, I don't
24 know what that is. As I stand here, I'm in the
25 dark in terms of what that is. But --

1 THE COURT: What QAnon is, or Q from James
2 Bond?

3 MR. COLLINS: Well, I know what Q from
4 James Bond is. With regard to what QAnon is, I
5 don't know that there's a tremendous amount of
6 information in terms of what that is. It's a
7 mysterious thing that some folks look at online.
8 But who it is, what it is, I couldn't tell you.
9 Who's behind it, I couldn't tell. And so, you
10 know, an opinion as to who's behind it, well, the
11 New York Times ran articles, and we cited to it in
12 our evidence. The New York Times, and I believe
13 the Daily Mail, both have statements where both
14 detractors and supporters of General Flynn in the
15 articles suggest that General Flynn is that
16 person. It is what it is.

17 But the notion that someone can't say that
18 in public, that that's an actionable statement,
19 that General Flynn suffered damages because it was
20 re-Tweeted, that's silly. The reality is that
21 General Flynn doesn't like what Mr. Wilson says in
22 public. General Flynn was the subject -- and it's
23 one of our exhibits. General Flynn was the
24 subject of a negative ad run by the Lincoln
25 Project, which Mr. Wilson helped found. It's a

1 political response. It's using this legal process
2 to impact and hurt a political opponent, without
3 any real opportunity -- without any real
4 opportunity to -- there's -- there's no winning on
5 a case like this. There's really no reasonable
6 suggestion that Flynn is Q. That Mr. Wilson
7 re-Tweeted that, that that's somehow worth
8 \$50 million, that that's somehow actionable. It's
9 not. Not by someone who's standing in front of
10 podiums with signs that say, "Where we go one, we
11 go all," not by someone who sells merchandise on
12 his website with the slogan, "Where we go one, we
13 go all."

14 And again, Your Honor, none of this is
15 contested. It's not contested at all. The Court
16 can go to General Flynn's website right now and
17 see he's selling shirts with these slogans.
18 That --

19 THE COURT: Can we just take a couple deep
20 breaths, maybe calm our voice down a little bit?
21 Is that possible?

22 MR. COLLINS: Of course.

23 THE COURT: Thank you.

24 MR. COLLINS: Thank you, Your Honor.

25 Mr. Wilson based his opinion on the wealth

1 of public information that exists with regard to
2 General Flynn, and he had every right to do it,
3 and the case law supports what Mr. Wilson did.
4 The case law -- first of all, the evidence
5 supports it, but there's more than that.

6 So, first, there's no evidence that
7 counters any of the undisputed facts. We think
8 that's a really important point for the Court to
9 consider. It's not as if Mr. Wilson somehow
10 mis-found it, Mr. Wilson is relying on something
11 that he shouldn't have relied upon, that he knew
12 better. There's none of that here.

13 The evidence here is that Mr. Wilson relied
14 upon all of these newspaper articles to support
15 the opinions. Case law supports a party relying
16 on reasonable publications to support an opinion.

17 There is no evidence to show that any of
18 this information is untrue. There is no evidence
19 to show that Mr. Wilson wasn't reasonable in
20 relying upon it.

21 In terms of the truth, again, there are no
22 facts in dispute. The statements, they're all
23 from reasonable, reliable sources. They're all
24 from sources that the Court readily would know.
25 Folks know the New York Times. Folks know the

1 Washington Post, CNBC, and the Daily Mail. These
2 are all well-known publications, so there's no
3 evidence here to refute.

4 Even if the Court were to find, okay, it's
5 not absolutely true, well, certainly, it's within
6 the realm of opinion or hyperbole. General Flynn
7 is a public figure. He was paid by RT. I don't
8 think -- that's not disputed. He was found to be
9 a foreign agent. He was found to have not
10 disclosed that he was a foreign agent. So the
11 statement, "Putin employee," really, I mean, maybe
12 they've got an argument on agency to say that, you
13 know, he wasn't a Putin employee, he was a Putin
14 agent, or maybe he was a Putin independent
15 contractor. But he took money from RT, and RT
16 plainly is an instrumentality of the Russian
17 government. It is not a stretch, by any means, to
18 call General Flynn, who accepted those funds, what
19 Mr. Wilson called him. It's not. And it's
20 protected speech under the First Amendment.

21 In terms of the interpretation of the
22 statements, I also think it's important that the
23 Court not stretch. One of the things that I
24 noticed in the reply brief that was filed by
25 General Flynn was an argument with regard to what

1 QAnon is. Again, it's not in the Complaint.

2 There's no evidence that any of this impacted
3 anything, and so there's no evidence to support
4 the claim that there's defamation here.

5 We argued this, and I want to be sure I go
6 through it. "Flynn is Q" could easily be, "Flynn
7 is a Republican," or "Flynn is a Democrat." It
8 does not, on its face, mean that Flynn is -- I
9 don't even know what QAnon is or the person behind
10 the drape or what that means, what that is.

11 There's nothing really clear in a three-word
12 statement, which is what we're here on, nothing in
13 terms of what that means and whether it's
14 actionable. And it's plainly a rhetorical
15 classification, and the case law supports a
16 rhetorical classification under the circumstances.

17 So I'm happy to go through the case law. I
18 want to be sure that I touch on everything the
19 Court wants to hear over the course of my time.

20 Would it be possible for me to perhaps
21 reserve some time in rebuttal?

22 THE COURT: Let me ask you this. Are we
23 going to hear from the other defendant and then a
24 combined response? Is that how you want to do it?

25 MR. HUFFMAN: Yes, sir.

1 THE COURT: To the extent that we're
2 relying on the same case law, I don't need two
3 people to tell me the same thing. So one of you
4 can argue your case law. If there's some
5 differences, then each one of you can comment on
6 the differences.

7 MR. COLLINS: Your Honor, there are a
8 couple of cases that I want to mention, so I'll go
9 through it, and then I'll pass it off to
10 co-counsel -- or, to counsel for Mr. Stewartson so
11 they can address the issues.

12 The first thing I wanted to address is I
13 believe we sent the Court a thumb-drive that had a
14 number of cases and materials.

15 THE COURT: Yes.

16 MR. COLLINS: And I'll try to refer to the
17 cases by the number just to make it easier for the
18 Court.

19 On our list of cases, it's case number 33,
20 which is the United States v. Flynn. I think it's
21 important that the Court understand that it's not
22 just newspaper articles that we're relying upon.
23 It's findings of fact and conclusions of law from
24 other courts that have made findings of fact in
25 regard to what General Flynn was accused of having

1 done and lay out the facts in terms of the
2 controversy that existed from the time that he was
3 arrested in 2017 to the time that he was pardoned
4 in 2020. It is important that the Court have that
5 context behind the statements, because it matters
6 under this circumstance.

7 I want to talk about the Gundel case, which
8 is a Second DCA case that I believe is likely
9 controlling under the circumstances. I'm sorry.
10 Not likely. It is controlling under the
11 circumstances.

12 You're going to hear about a dispute
13 between the Third DCA and the Second DCA.

14 THE COURT: I think the Second has been
15 pretty clear that they take a different view. I
16 mean, they certify conflict and everything.

17 MR. COLLINS: That's correct.

18 THE COURT: And they double-down on that in
19 the Baird case.

20 MR. COLLINS: That is correct. And so we
21 take the position that the Gundel case is
22 controlling upon this Court, that the manner by
23 which the Court analyzes a motion to dismiss is
24 governed by the Gundel case -- I'm sorry -- a
25 motion to dismiss in an Anti-SLAPP context is

1 governed by the Gundel case, and we believe that
2 we have certainly met our burden with regard to
3 the motion to dismiss.

4 More than that, we've presented the Court
5 with an overwhelming amount of evidence that lays
6 out the history here in terms of the background of
7 General Flynn and why General Flynn is not just a
8 regular person. General Flynn is a public figure,
9 a substantial public figure, who's deeply involved
10 in political matters, who issued a statement
11 that's political on its face, and that resulted in
12 a response that is -- that cited General Flynn's
13 history. Effectively, that makes it true. And
14 it's certainly not actionable under Florida law.

15 The last case I want to discuss with the
16 Court is the Pullum case, which is a First DCA
17 case that I think is on point under the
18 circumstances. And that's a case that involves a
19 pastor that had a radio program, and over the
20 course of the program, he called a political
21 opponent a "drug pusher." And the First DCA found
22 that even though that wasn't necessarily accurate,
23 that they weren't a drug pusher, they were
24 responsible for alcohol sales, and that was not an
25 actionable statement, that "drug pusher," that you

1 could not win a defamation case under those
2 circumstances.

3 So the Pullum case, we think, is of major
4 importance here in the terms of political nature
5 of the statements. And, you know, the Court
6 concluded that Mr. Johnson's statement, which are
7 at issue in this case, were neither polite, nor
8 fair, and an apology would be in order. The First
9 Amendment requires neither fairness or politeness.

10 And really at core, this is a core First
11 Amendment case in terms of a party being able to
12 speak on political issues. Beyond that -- and I
13 think it's very important, because the Court can
14 rule upon this from the four corners of the
15 Complaint alone. This is a political case. This
16 is a case that was driven by a political dispute
17 between these parties. Mr. Wilson -- and it's
18 also part of our disputed facts. Mr. Wilson wrote
19 a book in 2018 that talked negatively about
20 General Flynn. There is a history here where
21 General Flynn was the subject of discussion in Mr.
22 Wilson's book. It's certainly not actionable, but
23 it's a political statement because he's a major
24 public figure.

25 In addition, you have an ad by the Lincoln

1 Project that dealt with General Flynn. He must
2 not have liked it. General Flynn in the Complaint
3 has his own political committee. He can raise
4 money, and he can run his own ads. But using this
5 process to punish his enemies is inappropriate.
6 And it's plain from the record in this case that
7 that's exactly what's happening here.

8 So I'm going to pass this to counsel for
9 Mr. Stewartson. I would like an opportunity to
10 rebut, if necessary, at the conclusion of the
11 hearing. Thank you, Your Honor.

12 MR. WHISENHUNT: Good afternoon, Your
13 Honor.

14 I think at its core, we look at not only
15 this case, but a series of cases very much like
16 it, both here within Florida in the state and
17 federal courts, and around the country, that
18 there's been an effort to weaponize the legal
19 system for political purposes. And I think most
20 of us would say, yeah, if you turn on the news, it
21 seems like that's one of these prevailing
22 political theories, that we've weaponized the DOJ
23 or we've weaponized the political system. But
24 what we've really done is we've entangled the
25 courts in something that certainly our founders

1 didn't expect or intend for them to be involved
2 in.

3 The First Amendment is expected to be broad
4 and encompassing and protective on nearly all
5 types of speech. In fact, when written, they
6 didn't qualify it. Over time, and reasonably so,
7 there have been revisions and restrictions on
8 creating public panic, shouting fire in a movie
9 theater, so the First Amendment would no longer
10 apply.

11 But when it comes to matters of public
12 concern, or when it comes to matters of politics
13 and the direction the country should go,
14 overwhelmingly, if not entirely, the courts have
15 always found those to be protected.

16 I don't begrudge the plaintiff not liking
17 it when people say mean things about him. I don't
18 like it when people say mean things about me. And
19 as a lawyer, there's no shortage of public
20 opinions about my profession or what I do, but
21 that doesn't create actionable defamation. I
22 appreciate the plaintiff doesn't like the
23 conclusions my client has drawn about him. Maybe
24 if the two were to sit down, they'd come to
25 differing final results.

1 But in the wealth of information that is
2 publicly accessible and available, that is already
3 a tremendous part of the conversation,
4 Mr. Stewartson has reached rational conclusions of
5 that information, and shared his summary review of
6 articles or added comment to other matters in the
7 public discourse.

8 I wanted to go, maybe, to a very elementary
9 level of review here, and that is what would
10 constitute a statement. We have guidance for
11 this, even within our procedural and evidentiary
12 rules of what a statement necessarily is. And it
13 must be something that is clear and unambiguous
14 and provably true or not.

15 And in many of the instances, the
16 statements alleged here are simply not legally
17 statements at all. The suggestion, for instance,
18 by Mr. Stewartson that the plaintiff is "running
19 QAnon" is, on its own, ambiguous. I don't know
20 what necessarily is meant by "running" it. Is he
21 part of the board of directors? Is he the sole
22 one leading the charge? Is he literally running
23 alongside waving a banner that says QAnon? From
24 that statement alone, you cannot definitively say.
25 But what you can conclude is that it is

1 Mr. Stewartson's belief that the plaintiff is
2 involved in or affiliated with or associated with
3 such an organization. And as my colleague has
4 already laid out, there's ample public evidence to
5 support exactly that inference.

6 That General Flynn helped plan and execute
7 January 6th. I do not believe we have suggested
8 that the plaintiff, in this instance, is
9 responsible for creating calendars or writing down
10 the numbers of the days of the month. But as to
11 the specific events that transpired on January 6th
12 in Washington, D.C., the plaintiff Tweeted and
13 encouraged people to attend. And to that extent,
14 he helped plan and execute it. Now, whether or
15 not it went the way of his plan, I don't know.
16 But there's nothing defamatory to suggest that the
17 Tweet he sent out encouraging people to attend
18 wasn't, in fact, encouragement for people to
19 attend.

20 That he works for Putin. I think we've
21 pretty well beaten on that horse. But works for
22 him or is an asset to him or is a benefit to the
23 Russian government, I don't think there's a
24 dispute that he has taken a pro-Russia public
25 position on matters of public interest. And for

1 my client to remark upon that is not
2 inappropriate, nor is it actionable.

3 He's literally a traitor. We live in a
4 world, as bizarre as it is, where our own
5 dictionary has decided that the word "literally"
6 may also mean "figuratively," which is literally
7 insane, but the idea that he is literally a
8 traitor. A traitor has both a common parlance and
9 a legal consequence, and the suggestion of someone
10 being traitorous or a traitor to our country is
11 something that we are hearing over and over again
12 in political stump speeches, and it's become an
13 unfortunate part of our political rhetoric in this
14 country where both sides regularly lob the term
15 "traitor" for disloyalty or anti-American at one
16 another. True or otherwise, it has simply become
17 part of our political rhetoric.

18 He's a terrorist. And, again, we all have
19 our own -- there's a legal consequence to that.
20 All right. There's an actual charge for terrorism
21 in the United States Code, but there's also the
22 colloquial reference of people who are
23 "terrorizing" this country. These are opinions.
24 It's not provably true or false if those opinions
25 are true.

1 And that same logic applies all the way
2 through. The statements alleged in the Complaint,
3 with rare exception, are instances where
4 Mr. Stewartson is adding comment or commentary or
5 expressing an opinion or summary of something else
6 that has been Tweeted. And he's allowed to do
7 that. He can watch a speech on TV and then offer
8 his thoughts or opinions about it. And you can
9 agree with him. You can disagree with him. You
10 can ignore him. It doesn't matter. But we have
11 this platform where the town square has become
12 Twitter or X and people can just shout out loud
13 whatever they want, and you can follow or not or
14 like or not.

15 But as we look at this case for what it
16 really is, because I struggle to believe that the
17 plaintiff is truly operating from a perspective
18 where his feelings have been hurt and he doesn't
19 like being called names, because I imagine this is
20 not new in his life, he's been at a high level in
21 the government and in the military, and certainly
22 anybody who has served knows that sometimes you
23 get called mean things.

24 I think there's another reason for this,
25 and as we look at the actions, it is pervasive.

1 Anyone who's saying mean things about the
2 plaintiff is becoming the subject of these
3 lawsuits. There are any number of these cases
4 co-occurring right now in this state. And if not
5 to silence people saying mean things, then what's
6 the point?

7 The information is all already out there
8 and all over and part of the public discourse, and
9 so it really seems like nothing more than trying
10 to silence people who are critical of him, or to
11 bleed dissenting views and opponents of their
12 resources by forcing them to engage in lawsuits
13 that deprive them unsued to continue to spread
14 their views and opinions.

15 There is not a disagreement that the
16 plaintiff is a public figure. I don't think
17 there's a disagreement that Twitter is a horrible
18 place filled with all sorts of people saying all
19 sorts of things. And truthfully, Your Honor, if
20 we could somehow come to the end of this case and
21 you could find a way to bring Twitter out of our
22 public lives, I think we would all be better for
23 it; but I think we're stuck with it,
24 unfortunately. And so as long as we're stuck with
25 public squares, whether they're digital or real,

1 people are going to be entitled to stand up and
2 share their opinions on all manners of things and
3 upon one another, and to suggest that it becomes
4 the subject of a lawsuit and it clogs our
5 courtrooms and it bogs down our system litigating
6 because people said not nice things to people who
7 have objectively done remarkably comparable
8 things.

9 I would also note one thing that I expect
10 may come up. There are different types of
11 presidential pardons. There are pardons based
12 upon, for instance, actual innocence. The pardon
13 that the plaintiff received from President Trump
14 was not an actual innocence pardon. The language
15 of that pardon simply foreclosed any prosecution
16 of the plaintiff for that specific conduct or any
17 related conduct, but made no assertion that he was
18 not, as he had himself admitted and pled, guilty
19 of those crimes to the United States. The
20 inference then of any member of the public to view
21 a high-ranking military official, who worked
22 against the interests of the United States and
23 lied and misled, is a fair comment. It doesn't
24 mean he's an altogether bad guy, but it does mean,
25 in his public role, he's subject to criticism, and

1 he's subject to dislike or distain, and he's
2 subject to people sharing publicly the fact that
3 they think he's not such a great person. But he
4 doesn't get to tell them to be quiet because he
5 didn't like it, and he doesn't get to ask the
6 Court to impose monetary fines because people are
7 saying mean things about him. And if we open the
8 door to that where every time someone on social
9 media said something that someone doesn't like,
10 they can run to the courthouse, we're in a lot of
11 trouble.

12 So, Your Honor, at this point, unless the
13 Court has very specific questions, we'd rely on
14 what has been previously raised by counsel for
15 Mr. Wilson. I think he did a tremendous job
16 laying out a lot of the framework here. And I
17 would reserve an opportunity to respond to
18 whatever counsel for the plaintiff may offer.
19 Thank you.

20 MR. HUFFMAN: Thank you, Your Honor. May
21 it please the Court.

22 These motions should be denied and the case
23 should move forward toward discovery for some of
24 the very same reasons briefed by defendant
25 Stewartson.

1 On page 13 of his motion to dismiss, Your
2 Honor, he cites some cases, including the Hustler
3 case from the Supreme Court, that say, "Mere
4 opinion or hyperbole could become actionable,
5 defamation, or libel when the statements could
6 reasonably be understood as describing actual
7 facts or events about a person."

8 So under the very standard they're citing,
9 if the statements cross the line from being
10 obvious mere opinion or hyperbole and become
11 statements of fact, then they can be the proper
12 subject of a defamation or a libel case like this
13 one.

14 On page 14, Mr. Stewartson cites an Amazon
15 case from the Eleventh Circuit. It says that the
16 statement in dispute, quote, "Must be sufficiently
17 factual to be susceptible to being proven true or
18 false," end quote.

19 Under this case law, broad opinions, even
20 disparaging and ridiculous and ridiculing ones,
21 are tolerated as long as they don't cross the line
22 and become false statements of fact that are
23 readily capable of being proven or disproven.

24 Mr. Stewartson, and probably Mr. Wilson,
25 but in any case Mr. Stewartson, cites a case

1 President Trump lost because being called a Nazi
2 or Hitler-like was found to be in the realm of
3 opinion and not sufficiently factual. This is not
4 such a case.

5 The defendant cites some examples from
6 General Flynn himself, some of his own Tweets and
7 statements with some tough talk, but they can't
8 come up with any examples where he actually
9 crosses the line and makes a false statement of
10 fact, a specific provable fact, in any of the
11 statements they quoted.

12 But these defendants did cross that line.
13 Mr. Stewartson said publicly that General Flynn
14 founded and has been running the QAnon movement
15 for years, and actually is Q himself. That he
16 helped plan the Capitol riot on January 6th and is
17 a terrorist. That he actually works for the
18 Russians as a paid spy reporting directly to
19 Vladimir Putin, making him a, quote, "literal
20 traitor," end quote. That he wants a second
21 Holocaust. That he, quote, "works for a
22 transnational crime syndicate that includes
23 Vladimir Putin," end quote. I'm going to say that
24 again. "Works for a transnational crime syndicate
25 that includes Vladimir Putin." Personally

1 tortured prisoners. Quote, "In 2013, allowed
2 Edward Snowden to break into top secret DIA
3 servers in order to share military secrets with
4 the Russians," end quote. That he serves as
5 Russia's, quote, "general of the propaganda," end
6 quote, in America. That he, quote, "Tried to deal
7 nuclear secrets," end quote. And that he, quote,
8 "Literally tried to murder Mike Pence," end quote.

9 Those are astounding statements of specific
10 fact, and the Complaint attaches images of the
11 actual Tweets in numerous numbered paragraphs.

12 He emphasizes such statements with words
13 like "actually," "literally," "truly." He boasts
14 special access and knowledge of these supposed
15 facts, and claims that his special knowledge
16 resulted from years of digging for information and
17 documenting it. Well, if that's true, let's see
18 it. That's the purpose of the discovery process.
19 He's produced no such evidence to support his very
20 specific factual allegations. And point of fact,
21 neither has Mr. Wilson.

22 The specific facts that Mr. Wilson is
23 charged with making here do not appear in the
24 materials he provided, and the materials he
25 provided don't provide any reasonable basis for

1 those statements.

2 And General Flynn's attorney at one point,
3 and this is in the Complaint, as well, Tweeted
4 that such defamation needs to stop or there will
5 be legal action. And Mr. Stewartson replied that,
6 General Flynn has been working for Putin for a
7 decade and, quote, "is Q," end quote, and asks,
8 quote, "What are you going to do about it?" end
9 quote.

10 Mr. Wilson, who has a much larger audience,
11 has repeated and amplified some of these false
12 statements of fact, including specifically
13 alleging that General Flynn is an actual employee
14 of Vladimir Putin, and that he is, indeed, Q
15 himself. Mr. Wilson was not an original defendant
16 in this case. At the beginning it was just
17 Mr. Stewartson, and this was considered to be a
18 smaller claim, Your Honor. Mr. Wilson was added
19 in the first amendment because he chose, and he's
20 a sophisticated gentleman, he knows how this
21 works, he knows better than to make these
22 statements of fact as he did, he chose to insert
23 his head into this thing and to amplify these
24 defamatory statements, and that's why he got added
25 as a defendant. And this became a much larger

1 case because he has a much larger reach.

2 The Second Amended Complaint was the same
3 situation. Now the statements are being amplified
4 on a platform called MeidasTouch that reaches
5 potentially two million people.

6 In case the Court is unfamiliar with what Q
7 and QAnon is all about, Exhibit 16 to Mr. Wilson's
8 previous motion to dismiss -- I think it's got
9 different numbering now, but it was Exhibit 16 --
10 explains that it's a far-right fringe movement
11 that believes our government is controlled by a
12 coup of satanic pedophiles who drink the blood of
13 scared children, and that President Trump, aided
14 by the New Space Force, is in an epic battle to
15 take them down and has secret information to do
16 so.

17 The defendant saying that General Flynn is
18 the man behind that movement, that he's the one
19 who actually posts these things, along with all
20 the Russian spy and traitor stuff, is their effort
21 to besmirch and beclown him and to promote hatred
22 for him, to injure him personally and
23 professionally, and to line their own pockets by
24 being able to monetize these kinds of statements.

25 Now, one major problem with this, and he's

1 alleged he's been damaged by this, is he's alleged
2 that it impacts his ability to get the kind of
3 speaking engagements that they ridicule him for
4 taking.

5 One problem with this, though, Your Honor,
6 and it's a big problem, it's a growing problem, is
7 something called stochastic terrorism. You put
8 these statements out with the media, and they
9 filter down to crazy people who take action on
10 them. We saw that with Justice Kavanaugh where a
11 man flew across the country and showed up at his
12 house and tried to kill him. And that's the
13 problem with these kinds of reckless statements of
14 fact.

15 They could have couched this as an opinion.
16 They could have said, "You know, it sure looks
17 like he's sympathetic to the Russian government."
18 They could have said that it looks like he's
19 sympathetic to the QAnon movement. But instead,
20 they said he is Q and that he's an actual employee
21 of the Kremlin reporting to Vladimir Putin.

22 And so that gets to -- that gets to
23 business people who cancel his engagements. I
24 mean, these are things that will come out in
25 discovery. And ultimately, it gets to the crazy

1 people who say, "Look, there's Q having dinner
2 right over there. Let's get him."

3 Now, again, as the defendants argue in
4 their briefs, there's a line between mere opinion,
5 no matter how nasty, and false statements of fact.
6 And I have some analogies that I think are
7 helpful, because Q is not something everyone is
8 familiar. Although, like I said, their exhibit
9 kind of makes it clear.

10 For example, we tolerate people calling
11 each other racists. Unfortunately, it's common
12 nowadays. But if I were to say, "Not only is
13 Mr. Wilson a racist, but he's, in fact, the
14 Imperial Wizard of the Central Florida Knights of
15 the Ku Klux Klan," something that specific, the
16 equivalent of calling General Flynn Q, then I've
17 crossed the line and made a false statement of
18 fact. And if I know or have reckless disregard
19 for whether he is, in fact, the Imperial Wizard
20 and I keep saying that he is with no proof over
21 and over again, to literally hundreds of thousands
22 of people, using words like "truly," and
23 "literally" and like he's "actually" the Imperial
24 Wizard of the local chapter of the KKK, if I
25 actually published that statement, now I've

1 defamed him, and it's, in fact, defamation, per
2 se, which means presumed malice and presumed
3 damages.

4 Suppose his attorney sends me a letter that
5 says, "Sir, you know my client is not the Imperial
6 Wizard. He's not even in the Klan, so please stop
7 publishing the false statement of fact or we'll
8 have to sue you," and I respond publicly, "You
9 are, in fact, the Imperial Wizard. What are you
10 going to do about it?" As Mr. Stewartson did
11 here, "You are Q. What are you going to do about
12 it?" And if I move to dismiss his inevitable
13 lawsuit for that outrageous and injurious conduct,
14 I'd get laughed out of court, and I should.

15 People on the conservative side are
16 increasingly fond of calling liberals communists.
17 And this gets to the Russian traitor stuff. But
18 if I were to do exactly what these two defendants
19 did and publicly say that each of them is
20 "actually," "literally," "truly" a paid communist
21 spy and traitor working for Beijing under the
22 direction of Xi Jinping himself as the CCP's
23 foreign minister of propaganda, the same thing
24 they alleged about General Flynn, and if I were to
25 describe specific things they supposedly did for

1 the CCP to harm America, you know, selling nuclear
2 secrets, allowing people to break into servers,
3 these are disgraceful crimes punishable by death,
4 and now I've crossed the line from tough rhetoric.
5 It's defamation per se. And if I did that, I
6 would deserve to get sued. I would deserve to get
7 laughed out of court if I moved for dispositive
8 relief without some solid proof that they were
9 actually paid Chinese communist spies and did the
10 specific things that I accused them of.

11 I can call a political activist satanic,
12 but if I accuse them of being an actual minister
13 in a particular satanic temple, now I've crossed
14 the line, and I should expect to defend a
15 defamation per se case. And these defendants
16 crossed that line.

17 And in those examples, it wouldn't do to
18 say, well, with someone on the far left, there's a
19 particular fondness for communism or for an evil
20 master, so is that really derogatory? That's
21 essentially their argument. That there's some
22 sympathy on the right for the QAnon movement, so
23 is it really bad? It's the same thing. There's
24 some sympathy for, you know, things that can be
25 considered satanic on the left, so is it really

1 bad to say that they're actually the minister of a
2 particular satanic temple? Yeah, it would be
3 defamation per se, unless there's some good reason
4 to believe that's the case and I'm prepared to
5 bring some proof that it is.

6 And that's their halfhearted argument about
7 QAnon. The part about this, you know, possibly
8 referring to the character from James Bond is, you
9 know, perhaps amusing in a different context, but
10 this is far more serious to General Flynn.

11 And they don't -- they don't even attempt
12 their argument on the traitorous stuff, that, you
13 know, somehow it would be okay to be considered a
14 Russian traitor in this country. They don't even
15 attempt to say, well, you know there's some
16 sympathy for that, because that would be a silly.

17 At this stage of the proceedings, and
18 without any proof from the defendants to the
19 contrary, it's enough to say -- it's enough to
20 allege that these defamatory per se statements
21 were, in fact, injurious to General Flynn's
22 livelihood, that they paint him into a dark
23 corner, that they attempt to beclown him, make a
24 mockery of him, make it more difficult for him to
25 earn his living, caused him various other

1 injuries, get crazy people after him, as I said.
2 And, again, had they merely called him, General
3 Flynn, a traitor or a Russian sympathizer or a
4 conspiracy theorist, we wouldn't be here.

5 Actually, if they had -- well, at least in
6 Mr. Wilson's case, if he had retracted the
7 statements and said, "Look, folks, these were
8 statements of opinion,"
9 he wouldn't be here. But when you say an American
10 general is a literal spy in the employ of the
11 Russian government with an official title, you
12 know, he's working for Vladimir Putin, who allowed
13 specific espionage, personally tortured prisoners,
14 when you say he's the founder and leader of the
15 infamous QAnon movement -- which, by the way, Your
16 Honor, and it's in our briefing as well, it's
17 officially been designated as a terrorist group --
18 those are actionable statements of fact, which
19 means the defendants' motion to dismiss should be
20 denied and we should move forward with discovery.

21 And we don't have a problem with them
22 taking another shot at summary judgment. I know
23 the Anti-SLAPP Rule says Your Honor can construe a
24 motion to dismiss as a motion for summary judgment
25 to allow some materials outside the four corners.

1 We didn't have a problem with that. We don't have
2 a problem with them taking another shot at summary
3 judgment, if they can file some real evidence, you
4 know, not hit pieces by the New York Times and
5 CNN, but real evidence. Some of these things are
6 editorials.

7 And none of the materials they attached or
8 cited supports the truth of the defamatory
9 statements, the specific factual statements, that
10 are the subject of this case.

11 And those media outlets -- and the reason
12 that those statements don't appear in those
13 articles is because they have editors, and those
14 media outlets know better, or they would be sued,
15 as well. And Mr. Wilson, in particular, knew
16 better. And Mr. Stewartson failed to submit any
17 proof that he was actually aware of any of the
18 materials that he relies upon when he made the
19 outrageous defamatory statements. He's just kind
20 of gone back after the fact and cobbled together
21 some things that might provide a flavor similar to
22 what he was saying.

23 And, indeed, we believe the Court should
24 decline to take judicial notice of the articles
25 for these reasons, because it can't truly be said

1 that the New York Times, CNN, and the like are
2 sources whose information can't reasonably be
3 questioned. That's the only basis for the request
4 for judicial notice. It's Section 90.202(12), and
5 that says that the Court may take judicial notice
6 of, quote, "Facts that are not subject to dispute
7 because they are capable of accurate and ready
8 determination by resort to sources whose accuracy
9 cannot be questioned."

10 THE COURT: Well, let me ask you this,
11 because I understand the point you're trying to
12 make, that the content of the CNN articles are not
13 actually facts; but they were published in some
14 regard, so is the public allowed to rely on those
15 prior publications to then make statements
16 themselves?

17 MR. HUFFMAN: That's a good question, Your
18 Honor. I don't -- I don't take an issue with that
19 being part of their defense. What I have a
20 problem with --

21 THE COURT: Let me ask you this. Let's
22 say you're saying here that you accuse Mr. Wilson
23 of being a communist, and you're saying it here in
24 open court, and you've got your litigation
25 privilege, and that exists, and then a report

1 says, Oh, he was claimed to be a communist or it
2 was stated he was a communist, and then someone
3 else, in reliance on that newspaper publication,
4 calls someone -- or, calls Mr. Wilson a communist.
5 Is there a cause of action at that point against
6 anyone -- a successful cause of action, I should
7 say?

8 MR. HUFFMAN: Well, calling someone a
9 communist probably fits within that Trump case
10 similar to calling someone a Nazi. If you go a
11 step further and you allege specifically that they
12 are, in fact, an employee of Beijing and worked
13 with the CCP to steal nuclear secrets or
14 something, now you have an actual statement of
15 false fact. But to call them a mere communist,
16 probably not.

17 THE COURT: Okay. Well, let's say you said
18 that. Now, put aside that you might be
19 responsible under Bar rules for making a statement
20 that might not have a good-faith basis, so put
21 that aside. But the same set up that I just said,
22 that a reporter reports what you said in open
23 court, and then someone then comments or calls
24 that same person what you said in open court, but
25 based on what the reporter wrote.

1 MR. HUFFMAN: You know, I could see -- I
2 could see someone using some articles as part of
3 the defense, and I think that's a question of fact
4 that would have to go to the trier of fact: Was
5 it reasonable, based on that, to make an
6 allegation of a specific fact?

7 The issue I have with this particular
8 request for judicial notice is that the statements
9 that we take issue with don't appear in there,
10 because those publications are too wise to make
11 such statements of specific fact, and the only
12 basis for which they've asked to dump 400-plus
13 pages into the court file is this 90.202(12) that
14 says that the Court should take notice of things
15 that can't reasonably be questioned as to their
16 accuracy.

17 And then we get into the hearsay rule,
18 because they're, you know, clearly trying to rely
19 upon these materials for the truth of the matter
20 asserted wherein.

21 I think there's a relevancy problem because
22 they don't support the specific statements of fact
23 that were made, and I think we've got a hearsay
24 problem because, you know, they're being brought
25 for the truth of the matters therein.

1 Now, I think what Your Honor is getting at
2 is an exception to the hearsay rule, which is to
3 show notice. So if the only point is to show that
4 these things are out there and that they exist,
5 the Court could take notice, I suppose, of the
6 fact that these kinds of materials exist; but I
7 just don't see the relevance here as to these
8 specific focal points, and I think they've used a
9 poor vehicle to try to get this into the case
10 because these aren't -- these aren't facts not
11 subject to dispute, and these aren't sources the
12 accuracy of which can't reasonably be questioned.
13 Those sources get things wrong all the time.

14 So that's -- you know, those are the issues
15 I have with it. But I don't think that it helps
16 them either way with the kinds of statements, the
17 kinds of outrageous statements, particularly from
18 Mr. Stewartson, that I went through earlier.

19 And again, their very own legal arguments
20 about the difference between tough rhetoric and
21 actionable specificity should cause them to lose
22 this argument. They lose on the pleadings. And
23 whether they win after discovery and the
24 submission of actual evidence, that should be for
25 another day.

1 And an important thing that I didn't hear
2 too much talk about, and I definitely didn't see
3 in their briefing, which is strange because we've
4 been raising this point for months, is on
5 defamation per se. They also crossed the line
6 from defamation. It's defamation per se, and
7 there are significant consequences to that, Your
8 Honor.

9 Defamation per se includes a statement
10 that, quote, "Charges that a person has committed
11 an infamous crime that tends to subject one to
12 hatred, distrust, ridicule, contempt or disgrace,
13 or tends to injure one in his trade or
14 profession," end quote. That's the Florida
15 Supreme Court's language from the Richard v. Gray
16 that's been cited, in which the court found that
17 accusing a city councilman of specific bribery on
18 a radio show was defamation per se. The person
19 said he had this secret information that would
20 land the plaintiff in prison when it came to
21 light. And these defendants' statements are
22 similar, though much worse, and plainly need to
23 stand for defamation per se.

24 And importantly, neither defendant makes
25 any real attempt to address plaintiff's defamation

1 per se allegations or legal arguments, much less
2 to refute those allegations with proof.

3 And this is, as I said, incredible, because
4 for months since the last round of motions that
5 went to hearing last year that we've been arguing,
6 they don't even address our claims of defamation
7 per se. I searched all of Mr. Wilson's 361 pages
8 of his motion and materials, and per se doesn't
9 appear anywhere in his materials, not once. And
10 the same thing with Mr. Stewartson's materials.
11 There was no attempt to argue that this is
12 garden-variety defamation rather than defamation
13 per se, because it is clearly defamation per se.

14 And the consequence of a good and well-pled
15 defamation per se claim is that both malice and
16 damages are presumed. We've alleged those things
17 anyway to cover both bases, but they are legally
18 presumed. Because the defendants failed to
19 meaningfully challenge those allegations, they
20 should lose these motions on that basis alone.
21 That's the holding in the Levy case cited in our
22 responses.

23 General Flynn has alleged that with these
24 kind of reckless false statements of specific
25 fact, that they've damaged his business interests,

1 and that's what's sufficient at this juncture.

2 And they've damaged his person, too. And all
3 they've said is, "We got it," with no supporting
4 evidence whatsoever to shift the burden on that
5 issue.

6 And to fit their case within the Anti-SLAPP
7 statute, which is 768.295, the defendants have to
8 show that this action is otherwise without merit
9 and primarily designed to chill free speech.

10 Well, defamation per se is not free speech
11 by definition under the -- I'm going to spell this
12 case -- it looks like Beauharnais,
13 B-E-A-U-H-A-R-N-A-I-S and, Gertz, G-E-R-T-Z, the
14 Supreme Court case we've cited on page 7 of our
15 response to Mr. Stewartson, or thereabouts.

16 So, again, to fit this within the
17 Anti-SLAPP statute, they would have to show that
18 it's without merit and primarily designed to chill
19 lawful free speech. But they don't even challenge
20 that this is defamation per se, and defamation
21 per se is unlawful speech. And these claims have
22 merit, so the statute is inapplicable.

23 Now, the parties do talk quite a bit about
24 the Gundel case. I can tell Your Honor is
25 familiar with it. And that's the kind of

1 situation that the Legislature clearly envisioned
2 when the Anti-SLAPP statute was passed. A group
3 of homeowners banded together and publicly
4 campaigned against a developer in a community
5 development district, who then sued them under
6 various contract provisions to get a leg up in a
7 battle about amenities. So they brought a public
8 campaign, and they got sued to thwart their
9 efforts and shut them up. And that's nothing like
10 this case. This is merely an effort to stop the
11 spread of specific and highly personal lies told
12 about one gentleman to injure him.

13 And we have an injurious falsehood claim.
14 The plaintiff has also stated a proper claim for
15 injurious falsehood. It merely requires
16 allegations that a falsehood has been published
17 that the defendant knows will likely result in
18 others not wanting to deal with the plaintiff, and
19 then it does result in such lost opportunities
20 causing damages. We've pled those elements.

21 And the consequence of such a claim is
22 that, there again, malice is presumed under the
23 Duval Title case cited on page 18 or thereabouts
24 of our response of Mr. Stewartson. The analysis
25 is similar, so the defendants should lose on this

1 count, as well. And notably, the Leavitt case
2 that we cited from the Middle District held that
3 it was natural and foreseeable that a patient
4 would stop making appointments with a doctor after
5 someone lied that the doctor was retired. Again,
6 a specific statement of fact that's either true or
7 not true. So the court said there was a good
8 claim there for injurious falsehood. And the lie
9 in that case is benign compared to the lies in
10 this case.

11 And in terms of malice, which, again, is
12 presumed under defamation per se, and they don't
13 even challenge that, but we generally alleged Rick
14 Wilson's malice, as is permitted, and we quoted
15 his numerous Tweets gleefully exclaiming that
16 General Flynn is going to jail as evidence of that
17 malice. I don't believe counsel meant to suggest
18 that we were citing this "go to jail," "you're
19 going to jail" Tweets as part of the defamatory
20 statements. We were merely using them to show
21 malice.

22 Mr. Stewartson's alleged malice is far more
23 obvious. He mocked General Flynn's wife for some
24 financial misfortune. He called plaintiff a F'ing
25 loser and a F'ing asshole. Excuse me, Your Honor.

1 Except he used the full F-words, of course. He
2 doctored photos of General Flynn's dead mother.
3 He made it look like she called herself, quote,
4 "Crazy ass Helen Flynn," end quote, to talk about
5 her haunting people as a malevolent ghost, and
6 said generally of such efforts, quote, "I admit
7 it. I'm enjoying this," end quote. That's the
8 gentleman's dead mother. How angry would you have
9 to be, how much would you have to hate someone to
10 doctor photos that talk about someone's dead mom
11 haunting people as a crazy malevolent ghost? And
12 imagine coming into court and disputing that
13 malice after doing so.

14 While it's difficult to get inside
15 someone's head, it's plain to see where these
16 defendants are coming from, and malice may be
17 proven by circumstantial evidence.

18 There's a type of fraud where that's the
19 case, as well, Your Honor. It's fraud in Florida
20 if you enter into an agreement, such as a
21 contract, with no present intent to honor the
22 agreement. It's a very difficult form of fraud to
23 prove, but it's an actionable form of fraud, and
24 you're allowed to prove it by circumstantial
25 evidence, just like here.

1 In the Thompson Supreme Court case cited on
2 or about page 13 of our response to
3 Mr. Stewartson, the court held, quote,
4 "Allegations that are so inherently improbable
5 that only a reckless man would have put them in
6 circulation," end quote, are themselves evidence
7 of malice. And we contend the defendants'
8 statements fit that description.

9 One of the reasons General Flynn brought
10 this case is because these kinds of defamatory
11 reports tend to build on each other; and if we let
12 defamatory false assertions of fact by the
13 Mr. Stewartsons and the Mr. Wilsons of the world
14 go unchallenged, and get tremendously amplified by
15 folks like Mr. Wilson with more reach, if we let
16 those kinds of statements go unchallenged and
17 amplified and put on now another media outlet with
18 two million people potentially seeing those
19 statements, then before too long folks will be
20 saying, It's widely reported that Mr. Flynn
21 is Q -- that General Flynn is Q. It's widely
22 reported that he's an actual employee of the
23 Kremlin. That he stole nuclear secrets and gave
24 them to Vladimir Putin. That's he's an attempted
25 murderer. And the rest of it. He shouldn't have

1 to put up with that. We either let this stuff
2 spread or we nip it in the bud, and he chose the
3 latter. And that's his legal right.

4 And where are the reactions from these
5 defendants where they retreated -- or, yeah, I
6 guess retreated would be okay, but retracted these
7 Tweets and said, "Look, folks, these are pure
8 guesses. These are opinions. They shouldn't be
9 taken as facts." Where are those statements from
10 them? Instead of those mitigating communications,
11 they state things as fact and insist everything is
12 a hundred percent accurate, make comments like,
13 "The truth hurts."

14 Mr. Stewartson was particularly defiant in
15 asking, "What are you going to do about it?
16 You're Q. I said it. What are you going to do
17 about it?" Well, here we are. This is what we're
18 doing about it.

19 These are well-pled defamation and
20 injurious falsehood claims, Your Honor, and the
21 defendants are trying to short-circuit this
22 litigation rather than getting to the merits. If
23 they truly believe -- and I really challenge them
24 with this. If they truly believe that General
25 Flynn is an actual employee of the Kremlin, who

1 stole nuclear secrets, or that he is, in fact, the
2 infamous blogger Q, they should welcome the
3 opportunity to pursue discovery and prove that.
4 That would be world famous. But instead, they
5 want to get rid of this case, and we all know why.

6 They haven't met their respective burdens,
7 and their motion should be denied.

8 Let me see if there's any other specific
9 things in reaction to their arguments.

10 Just in Mr. Wilson's argument, just, you
11 know, some reckless -- I guess some further
12 reckless statements of fact. Mr. Flynn doesn't
13 have any QAnon T-shirts on his website, and
14 there's no proof of that in the record. There's a
15 re-Tweet of a legal defense email that mentioned
16 some kind of T-shirt vendor, but, you know, he
17 doesn't have it on his website.

18 I like the statement from Mr. Wilson's
19 counsel, quote, "Who's behind it? I couldn't tell
20 you," end quote. Well, that's kind of the point
21 here. If Mr. Wilson has no basis to make these
22 statements of fact, he shouldn't be making them.
23 He should know better. The foreign agent
24 business. There's something in the record about
25 Turkey. There's absolutely nothing having to do

1 with Russia. So that's another reckless statement
2 of fact. General Flynn was never arrested.
3 That's another reckless statement of fact.

4 And in response to Mr. Stewartson's
5 argument, they haven't cited any case like this
6 where a statement of stone-cold fact of a nature
7 that would constitute defamation per se was
8 accepted by a court as mere opinion or political
9 speech.

10 The statements in the Trump case, you know,
11 that he's a Nazi or that he's Hitler-like, that
12 doesn't even compare to these statements made in
13 this case. And they're backtracking from their
14 own statements of fact. You know, they both said,
15 "He is Q," or, "You are Q," and now
16 Mr. Stewartson, in his argument, wants to say,
17 well, that could mean that he's, you know, on the
18 board of directors of some QAnon group or that he
19 runs with a banner. No, they said he is Q. They
20 said he is the guy. They said he is a traitor.
21 He works for Kremlin. He's an actual employee.

22 And counsel expressed that he wished we
23 could get rid of Twitter because it's a filthy,
24 horrible place where bad things happen. Maybe the
25 solution is to clean it up, and perhaps the best

1 way to do that is to let people who maliciously
2 post false statements of fact to target and injure
3 people to be sued and make them defend themselves.
4 Thank you, Your Honor.

5 THE COURT: Reply.

6 MR. COLLINS: Sure. Your Honor, with
7 regard to the -- so on a broader point, the
8 defendant -- I'm sorry. The nonmoving party in a
9 matter like this, so it's the plaintiff, has an
10 obligation when a statement of undisputed fact is
11 put forward to put forth counterevidence, which
12 has not happened. And so with all due respect to
13 counsel, the only evidence before the Court is the
14 evidence that has been submitted into the record
15 by Mr. Wilson.

16 The evidence that we've submitted into the
17 record was mischaracterized by counsel, and I
18 think it's important that the Court at least allow
19 us to untangle some of the knots that I believe
20 are before the Court.

21 Number one, Mr. Wilson's Affidavit, which
22 is Exhibit No. 5, is an important piece of
23 evidence, because, number one, it's the only
24 affidavit before the Court. But, number two, it
25 states clearly that Mr. Wilson relied on all of

1 the articles that we cite in order to form his
2 opinion. That's important. That goes to the
3 relevance of the evidence that we've submitted.

4 So on the one hand I don't think there's a
5 dispute that these articles all ran in the
6 publications that they say that they ran in and
7 that they ran at the time. Now, that's number
8 one, and the Court can take judicial notice of
9 that.

10 Number two, Mr. Wilson relied on those
11 statements in order to formulate his opinion.
12 That's undisputed. That's in the record. And we
13 cited a case, Your Honor. It's number 9 in our --
14 in what we filed with the Court, but it talks
15 about reliance on reputable sources, and how a
16 person who makes a statement can rely on those
17 sources, and how courts will consider that
18 relevant in terms of whether or not the statement
19 itself is defamatory. If you rely upon reliable
20 sources, then you can have a well-formed opinion
21 and state it, even if a party believes that it is
22 defamatory.

23 I want to go to the claim that plaintiff
24 doesn't sell QAnon --

25 THE COURT: So for purposes of this motion

1 to dismiss, even under Anti-SLAPP, am I having to
2 make a finding that CNN is a reliable source by
3 taking judicial notice?

4 MR. COLLINS: No. By taking judicial
5 notice, the only thing the Court is doing is
6 saying that these are articles that ran online,
7 and accepting that as true, because there's no
8 counterevidence, and that Mr. Wilson relied upon
9 them. And because, again, there's no
10 counterevidence, counsel could have submitted
11 evidence saying he was wrong to have relied on
12 these things. He shouldn't have relied on these
13 things. These things are obviously wrong. That's
14 not in the record. So based upon the record
15 before the Court, Mr. Wilson relied on the
16 newspaper articles that we've cited. He says that
17 he's relied upon them, and the Court can take
18 notice of the fact that those are, in fact,
19 newspaper articles from those sources. The Court
20 doesn't have to find that the content of the
21 material is true, but it does have to find that
22 Mr. Wilson thought it was, and that is, in fact,
23 the evidence before the Court. That's with regard
24 to the newspaper articles.

25 With regard to the findings of fact by

1 other courts, I do believe that the Court can take
2 that into account in terms of what the record is,
3 what the public record is, what folks in the
4 public knew about General Flynn, certainly at the
5 time Mr. Wilson Tweeted what he Tweeted.

6 There was a statement with regard to QAnon
7 and General Flynn. There are multiple newspaper
8 publications, and I want to point them out to the
9 Court, that found that supporters and detractors
10 believe that General Flynn is Q. That's not --
11 these are articles that were written before
12 Mr. Wilson's statement by the New York Times and
13 by the Daily Mail, and it's part of our
14 documentation.

15 So Exhibit No. 24 is a February 6, 2021 New
16 York Times article, and in the article it says,
17 "Some have speculated," talking about General
18 Flynn, "he is the mysterious figure known as Q,
19 the purported government insider with high-level
20 security clearance who began posting cryptic
21 messages in 2017 about the Deep State trying to
22 destroy the president." So that's one. That's a
23 New York Times article.

24 And then Exhibit No. 21 -- I believe 21A --
25 no, Exhibit No. 21, a Daily Mail article, also has

1 a quote, "Believers in the QAnon conspiracy theory
2 have floated that Flynn could be Q." This, again,
3 predates the Tweet that is the subject of this
4 dispute from Mr. Wilson.

5 So these are well-known newspapers,
6 well-known outfits, that have made the same
7 suggestions, and certainly they weren't the
8 subject of any litigation from General Flynn, and
9 so that's an important point.

10 Another important point is that counsel
11 indicated that General Flynn is not selling
12 merchandise with the slogan -- I guess with a
13 QAnon slogan on it. That is not so, and the
14 record -- and the Court can find this in the
15 record.

16 Number one, Exhibit No. 21A is a website
17 called TheShirtShowUSA.com, and we included what
18 we found on that website, but the Court can go to
19 the website, and that is a publicly-available
20 website that has merchandise that has slogans that
21 say, "Fight like a Flynn," which is General Flynn,
22 and have slogans that say -- it's the acronym for
23 "Where we go one, we go all," and we cite the case
24 law that talks about that.

25 We also cite to a Daily Mail article that

1 talks about the fact that, and I'm quoting, "Mike
2 Flynn endorses the selling of QAnon merchandise
3 that pays into his legal defense fund." So it's
4 not just us saying it. It's reputable sources
5 saying it. And then, it's the source itself. The
6 Court sees and has in the record the actual
7 merchandise with General Flynn's name. And we
8 also have in our motion a Tweet from General Flynn
9 directing folks on Twitter to this ShirtShow.com
10 website to purchase merchandise to support General
11 Flynn.

12 So there is a tie there that we do believe
13 is important and lays out in the record, you know,
14 the nature of the contact that exists.

15 Counsel, unfortunately, changed the
16 statements that my client is accused of having
17 made. My client didn't accuse General Flynn of
18 being a terrorist. He didn't accuse General Flynn
19 of anything more than the two-word statement,
20 "Putin employee." It's important for the Court to
21 contextualize. Counsel didn't deal with this.
22 It's important for the Court to contextualize the
23 Tweet, because General Flynn issued a statement of
24 his own on Twitter, a lengthy statement, that is
25 very political in nature, on the day that Russia

1 invaded the Ukraine that goes to great lengths to
2 accuse the United States of having a role in
3 facilitating or being the cause of the invasion
4 and blames U.S. foreign policy for what Russia
5 did. Given General Flynn's history, which is
6 well-known, it is not out of bounds for Mr. Wilson
7 to have Tweeted, "Putin employee."

8 I would say to the Court as I conclude,
9 we're here today on summary judgment. Counsel is
10 talking about conducting discovery. Well, if
11 someone heard this and it injured General Flynn,
12 today is the day to bring that evidence forward.
13 Today is the day to show that they're disputed
14 material facts and to have evidence to back that
15 up. It's the day to bring an affidavit from
16 General Flynn. It's the day to produce their
17 evidence, to show what they have, because under
18 the Anti-SLAPP law, the defendants are entitled to
19 an expedited process. And so if there is evidence
20 that they have, it should have been here today,
21 and it's not, and so the record is effectually all
22 of the evidence here, and it supports the Tweets
23 that Mr. Wilson -- Mr. Wilson's two Tweets, one
24 that states, "Putin employee," and the other
25 statements, "Flynn is Q." It is -- it is either

1 true in terms of the statements themselves, or
2 it's rhetorical.

3 But more than that, it is important for the
4 Court to understand who these individuals are and
5 what they do. They're folks that, in Mr. Wilson's
6 case, runs an organization that, according to the
7 Complaint, raised \$87 million. They run
8 advertisements. They're involved in politics in a
9 significant way. So is General Flynn. The
10 battlefield of ideas ought not be in this
11 courtroom. The battlefield of ideas ought to be
12 in the public. General Flynn's case is purely --
13 we're purely here in an effort to subvert and
14 inhibit political public speech.

15 The Anti-SLAPP law exists to curtail this,
16 to ensure that parties aren't ensnared in
17 expensive and lengthy legal proceedings on
18 political disputes.

19 So I'd ask the Court to do two things
20 before I conclude. Number one, I'd ask the Court
21 to grant summary judgment to Mr. Wilson. Number
22 two, in the order granting summary judgment, I'd
23 ask the Court also to find that if summary
24 judgment weren't granted, that the Court would
25 dismiss the Complaint on the four corners of the

1 Complaint. Thank you, Your Honor.

2 MR. HUFFMAN: Your Honor, could I briefly
3 respond?

4 THE COURT: I'll give you, sir, rebuttal,
5 but let's get all the rebuttal first.

6 MR. HUFFMAN: Yes, sir.

7 MR. WHISENHUNT: Your Honor, I think
8 Mr. Huffman raised a fantastic point, because he
9 said in his analogy of Mr. Wilson's prior Tweet,
10 that if he had suggested that Mr. Wilson was the
11 Imperial Grand Wizard of the Central Florida
12 chapter of the Ku Klux Klan, if he said it, that
13 would be crossing the line. It probably would be.
14 But then he followed it up, because he said,
15 "Unless there is a reason to believe it is true."
16 And that's a really important caveat, because each
17 and every one of the statements at issue in this
18 case being alleged by the plaintiff as being
19 defamatory have behind them some reason to believe
20 that they're true. And, in fact, and I thought it
21 was interesting, when Mr. Huffman suggested that
22 Mr. Stewartson hadn't suggested the context of
23 these statements or his reliance on other things
24 in any way, their Complaint includes
25 Mr. Stewartson's comment connected to the thing

1 he's commenting about. They put into their own
2 Complaint the thing he's talking about or relying
3 upon.

4 And there's nothing in the evidence
5 presented to this Court that he ought not to have
6 relied on that, that it was unreasonable for him
7 to do so. And it's been well-established that
8 many of these things are the subject of a public
9 conversation that is far and wide within the media
10 spectrum, whether it's from the New York Times or
11 CNN or local regional papers or other people who
12 are Tweeting and commentating on these same
13 matters of public interest.

14 I can't think of a lot of things that are
15 worse than suggesting someone is Hitler-like, but
16 that doesn't cross the line. Suggesting that
17 someone who espouses the ideals of an
18 organization, markets themselves their products,
19 re-Tweets ideas consistent with their
20 philosophies, as being a part or participant or a
21 leader within that group. He is undeniably a
22 leader within that movement, whether he chooses to
23 be purposefully or not. The people in that
24 movement perceive him as a leader and follow him
25 where he goes. They give him their money. They

1 show up to his events. He may not be, but he
2 certainly has every public appearance of being so.
3 And for anyone, Mr. Stewartson, Mr. Wilson,
4 anyone, to comment is fair.

5 I thought it was interesting, as well,
6 because Mr. Huffman noted that, by his
7 understanding, the Q organization, whatever
8 ethereal boundaries it, I guess, has, has been
9 designated as perhaps a terrorist group. Well,
10 then, certainly, if one believed that Mr. Flynn is
11 espousing their ideology and marketing their stuff
12 and speaking at events where they seem to gather
13 is a part of that group, the following suggestion
14 that he is a terrorist seems well supported by the
15 plaintiffs's own claims that that organization is
16 a terrorist one.

17 Some of the things that Mr. Stewartson says
18 that are complained of by the plaintiff, that the
19 plaintiff literally tried to kill Mike Pence, that
20 he's part of a transnational crime syndicate, are
21 so fanciful and absurdist that nobody could be
22 reading those things and think they are true,
23 anymore than anybody opens up a Hustler magazine
24 and thinks Jerry Falwell is doing any of the
25 things depicted in the stories. Okay. There is a

1 limit of obvious absurdity. Even if it's painted
2 as serious and as straight-man as it could be,
3 some of these things are just impossible to take
4 as being meant as true, but meant as rhetorical
5 hyperbole, meant to take an idea to its absolute
6 extreme.

7 Going back to the plaintiff's example of if
8 Mr. Wilson, if he just made that allegation of
9 being a member of the Ku Klux Klan, maybe that
10 would cross the line, but if there were photos of
11 Mr. Wilson sitting with other known members of the
12 Ku Klux Klan, much like there's photos of the
13 plaintiff sitting with Vladimir Putin, or if there
14 was a history of payments from the Ku Klux Klan to
15 Mr. Wilson, much like there are records of
16 payments to the plaintiff from organizations that
17 are materially adverse to the United States, if
18 those connections are there, then the inference is
19 fair.

20 Plaintiff has suggested, in a conclusory
21 manner, that they have sufficiently pled
22 defamation per se. I challenge that, because it
23 was not responded to directly by defense for
24 Mr. Stewartson or Mr. Wilson, that the Court
25 should take note of that. I think the reason that

1 it hasn't been directly challenged is because they
2 haven't sufficiently pled defamation per se.

3 There's also, when we talk about with
4 actual malice, it isn't animus. It isn't a degree
5 of hatred. The legal standard for malice in the
6 context, in the confines, of a defamation suit
7 goes to the person's requisite knowledge of
8 falsity, not that they hate the person. And to
9 that extent, everything that Mr. Wilson relied
10 upon, everything that is connected to the
11 statements complained of by the plaintiff made by
12 Mr. Stewartson, haven't been suggested to this
13 Court as being unreasonably relied upon, and the
14 consequence of that is that none of these
15 statements then become actionable.

16 This Court should, in preservation of the
17 First Amendment, and to safeguard the importance
18 of a vibrant and sometimes difficult public
19 discourse about political matters and matters of
20 public interest, grant the defendants' motion to
21 dismiss this Complaint on its face and conclude
22 these proceedings with no further obligation on
23 defendant Wilson or defendant Stewartson.

24 THE COURT: You get the final word.

25 MR. HUFFMAN: Thank you, Your Honor.

1 I hate to do this, but I have to take
2 exception to the gamesmanship on the summary
3 judgment rule. Counsel reached out to us and
4 said, Hey, this hearing was set by His Honor back
5 in December. It occurs to us that less than
6 40 days will be between our response, which will
7 be in another motion and hearing date. Will you
8 allow the Court to consider essentially the same
9 motion we filed before? And we agreed not to be
10 sticklers on the 40 days under Rule 1.510 and
11 allow the Court to consider materials outside of
12 the four corners of the Complaint, which is
13 consistent with the Anti-SLAPP statute.

14 But this idea that without any pleading
15 from the defendant, without any affirmative
16 defenses, without any real discovery, that we
17 should, you know -- that this is a true full-blown
18 summary judgment hearing, I just take exception to
19 the idea that we agreed to that. We agreed that
20 Your Honor could consider in their motion the
21 Anti-SLAPP statute, which allows, much like an
22 insurance dispute, allows the Court to consider
23 things outside of the allegations, because the
24 allegations themselves aren't the limit of what
25 the Court can look at.

1 Regarding Mr. Wilson's argument, you know,
2 the idea that -- you know, alleging that, "General
3 Flynn could be Q," or saying, "I think he's Q,"
4 those would be statements of opinion. Maybe they
5 wished they would have phrased it that way, each
6 of the defendants, but that's not the way they
7 phrased it. Maybe they should have said on the
8 Russian stuff that he's Putin's lapdog or however
9 they want to phrase it, or a Russian sympathizer.
10 They didn't say that, though. They made specific
11 statements of fact that are provable. They're
12 either right or they're wrong.

13 And as I listen to arguments about the
14 T-shirt company and what the tie-in exactly was
15 with the General, it occurred to me how far we're
16 getting into disputed issues of fact. These
17 are -- these are issues, and we've talked about a
18 number of them today, that should go to the trier
19 of fact. They have to not only win on the facts,
20 but be entitled to judgment as a matter of law.
21 Under either standard, they haven't met that. In
22 fact, they haven't even met our defamation per se
23 case squarely at this point.

24 And Mr. Stewartson, in response to his
25 argument, he hasn't provided any competent basis

1 to make the specific charges that he has. And
2 those charges, you know, kind of get glossed over
3 in their argument, but they're ugly charges. You
4 know, not only that he is Q, but that he actually
5 planned the Capitol riot. That he works for the
6 Russians as an actual paid spy reporting directly
7 to Vladimir Putin. That he works for a
8 transnational crime syndicate that includes
9 Vladimir Putin. In the context of his other
10 statements, it can't be said that that's
11 ridiculous hyperbole that no one could take at
12 face value. It's consistent with the other things
13 he says. The idea that he personally tortured
14 prisoners. The allegation that, quote, "In 2013
15 he allowed Edward Snowden to break into top secret
16 DIA servers in order to share military secrets
17 with the Russians," end quote. That he serves
18 with a title for the Kremlin. That he, quote,
19 "Tried to deal nuclear secrets," end quote. That
20 he "literally tried to murder Mike Pence." I
21 mean, these are specific statements of fact that
22 should cause someone to have to defend himself
23 from this kind of suit. And Mr. Wilson, who
24 should know better, decided to amplify some of
25 this stuff in the manner that's been described,

1 saying that not only is he a sympathizer, you
2 know, something like that that he could say and
3 probably get away with it, or certainly get away
4 with it if that were the extent of it. But to say
5 that he's an actual employee of the Kremlin, he's
6 a Putin employee specifically, and to say that he
7 is Q, and to amplify that statement from
8 Mr. Stewartson, that puts not only General Flynn's
9 livelihood in jeopardy, but his life, as well. He
10 has to have security detail because people make
11 these kind of reckless statements, and he's
12 entitled to try and put a stop it. Thank you,
13 Your Honor.

14 MR. COLLINS: Your Honor, there's one
15 issue. I have one issue I need to address on the
16 record.

17 THE COURT: Let me be clear. I do not
18 operate under the last person who speaks wins.
19 That is not -- that is not how I rule.

20 MR. COLLINS: I hear you, but there's an
21 issue here with regard to the parties' agreement
22 that's now being withdrawn, to a degree, and it
23 needs to be stated.

24 Your Honor, I filed a motion -- it's in the
25 Court's file -- with regard to it, and it's the

1 notice of withdrawal of Rick Wilson's motion for
2 status conference. I have an email, and I'll do a
3 notice of filing on this, from opposing counsel,
4 Mr. Roberts, who approved the filing. And at
5 paren 2 -- paragraph 2 of that filing, it says,
6 "The parties have agreed to waive the language of
7 Rule 1.510(b)," and then in quotes, "The movant
8 must serve the motion for summary judgment at
9 least 40 days before the time fixed for the
10 hearing. And that is agreed to be waived." We
11 provided it to them in advance. They agreed to
12 it. They can't renege on it after the argument.
13 And we would just ask the Court to consider the
14 motion as what it is, a motion for summary
15 judgment. Thank you, Your Honor.

16 THE COURT: If you want to file something
17 in the court file, go ahead and file it.

18 I'm taking this under advisement, so I'm
19 not ruling today.

20 Is there anything else we can address in
21 the few minutes left, or have you all had enough?

22 MR. WHISENHUNT: Your Honor, I apologize.
23 I was unavailable Tuesday for the case management
24 conference, and I believe it was carried over
25 until today, so we probably do need to calendar

1 out some future occasion to speak.

2 And I also know that there is an
3 outstanding issue of the third defendant that has
4 not yet, I believe, been served, so the case would
5 not be at issue yet, depending upon, of course,
6 Your Honor's rulings, but I do think we need a
7 future date.

8 THE COURT: What do you propose? I mean,
9 do you all want a case management conference? Do
10 you want me to just set a trial date? A proposed
11 trial date?

12 MR. WHISENHUNT: Your Honor, I don't know
13 that -- I don't know your practice, if you're fine
14 with me sitting?

15 THE COURT: I don't care.

16 MR. WHISENHUNT: Okay. I feel like I think
17 better if I'm standing up, so I'm going to
18 continue doing so.

19 I think to set a trial or proposed trial
20 date at this juncture before the third codefendant
21 has been properly brought into the case, without
22 there having been filed an answer or any potential
23 other, you know, cross or counterclaims that could
24 be coming, may be premature, so I believe a case
25 management conference would be the most practical

1 next step for us to get a lay of the land where
2 each party is going to be.

3 THE COURT: Where are we on service?

4 MR. HUFFMAN: Your Honor, my office is not
5 handling the service of the new defendant. I'm
6 told that we've engaged a process server in
7 California. I haven't yet been told that I need
8 to come to Your Honor for a special order
9 appointing a process server out there. All I've
10 heard is that the efforts are underway.

11 THE COURT: Okay. So we're looking about
12 two months from now for a case management
13 conference?

14 MR. WHISENHUNT: I think that would
15 probably be reasonable. And certainly, if the
16 Court enters an order in the interim that
17 dismisses the action, we'll have no need of that
18 case management conference. So I think 60 days
19 out is a practical target date.

20 MR. HUFFMAN: I don't have an opinion on
21 the matter, Your Honor. Whatever the Court
22 prefers.

23 THE COURT: The afternoon of March 20th.
24 Hold on a second. They're looking at their
25 calendars.

1 MR. WHISENHUNT: That works for
2 Mr. Stewartson, Your Honor.

3 MR. COLLINS: It will work for defendant
4 Wilson, obviously, over Zoom.

5 THE COURT: Zoom is fine.

6 MR. HUFFMAN: I'm sorry. What was the
7 date, Your Honor?

8 THE COURT: Wednesday, March 20th, in the
9 afternoon.

10 MR. HUFFMAN: I think that's fine for
11 plaintiff. I'm being told by my co-counsel he can
12 cover it if necessary, so I think that works.

13 THE COURT: So why don't we say 3:00. Why
14 don't you do a Notice of Hearing. Just put it as
15 a case management conference. Okay. 30 minutes.
16 You all can appear by Zoom.

17 Anything else?

18 MR. HUFFMAN: Not from the plaintiff, Your
19 Honor.

20 MR. WHISENHUNT: No, your Honor. Thank
21 you.

22 THE COURT: That concludes this hearing.
23 Everyone have a good afternoon.

24 [PROCEEDINGS CONCLUDED AT 3:45 P.M.]

25

1 CERTIFICATE OF COURT REPORTER

2

3 STATE OF FLORIDA

4 COUNTY OF SARASOTA

5

6 I, Lisa M. Plante, Certified Court Reporter and
7 Notary Public in and for the State of Florida, at Large,
8 certify that I was authorized to and did stenographically
9 report the motion hearing on January 19, 2024; and that
10 the transcript is a true and complete record of my
11 stenographic notes.

12

13 I further certify that I am not a relative,
14 employee, attorney, or counsel of any of the parties; nor
15 am I a relative or employee of any of the parties'
16 attorney or counsel connected with the action; nor am I
17 financially interested in the action.

18

19 DATED this 23rd day of January, 2024.

20

21

22



23

Lisa M. Plante, RPR, FPR-C
LEXITAS Court Reporting
1-800-676-2401
LexitasLegal.com

24

25

<hr/>	2018	75:6,10	50:13	acronym
\$	26:19	79:9		66:22
<hr/>	2020	400-plus	<hr/> A <hr/>	acted
\$45,000	24:4	50:12		16:2
14:7	2021	<hr/>	ability	action
\$50	65:15	5	41:2	14:15 39:5
19:8	2023-CA-4264	<hr/>	absolute	41:9 49:5,6
\$87	4:6	5	73:5	54:8 81:17
69:7	2024	11:23,24	absolutely	actionable
<hr/>	4:1 8:10	62:22	21:5 60:25	7:4 8:14,18
1	20th	<hr/>	absurdist	18:18 19:8
<hr/>	81:23 82:8	6	72:21	22:14
1	21	6	absurdity	25:14,25
11:9 12:13	65:24,25	65:15	73:1	26:22 28:21
1.510	21A	60	accepted	31:2 36:4
75:10	65:24 66:16	81:18	21:18 61:8	46:18 51:21
1.510(b)	22	63	accepting	57:23 74:15
5:11 79:7	9:16	11:17	64:7	actions
100	24	67	access	32:25
15:17	65:15	6:11	38:14	activist
13	2:00	6th	accessible	44:11
36:1 58:2	4:2	30:7,11	29:2	actual
14	<hr/>	37:16	account	31:20
36:14	3	<hr/>	65:2	34:12,14
16	<hr/>	7	accuracy	36:6 38:11
40:7,9	30	7	48:8 50:16	39:13 41:20
18	82:15	14:22 54:14	51:12	44:12 49:14
55:23	33	768.295	accurate	51:24 58:22
19	23:19	54:7	25:22 48:7	59:25 61:21
4:1	34	<hr/>	59:12	67:6 74:4
<hr/>	7:13,16	8	accuse	77:6 78:5
2	361	<hr/>	44:12 48:22	ad
<hr/>	53:7	8	67:17,18	18:24 26:25
2	3:00	7:18 14:22	68:2	added
79:5	82:13	<hr/>	accused	29:6 39:18,
2013	3:45	9	10:16,19	24
38:1 77:14	82:24	<hr/>	23:25 44:10	adding
2016	<hr/>	9	67:16	32:4
12:18	4	63:13	accusing	addition
2017	<hr/>	90.202(12)	52:17	13:2,3
24:3 65:21	40	12:25 48:4		26:25

address 15:16,21 23:11,12 52:25 53:6 78:15 79:20	agency 21:12	32:6 38:1 46:12 48:14 57:24 77:15	analogies 42:6	appointing 81:9
addressed 5:13	agent 14:25 15:5 21:9,10,14 60:23	allowing 44:2	analogy 70:9	appointments 56:4
admit 57:6	agree 10:1 32:9	alongside 29:23	analysis 55:24	approve 5:23
admitted 34:18	agreed 75:9,19 79:6,10,11	alternative 6:6	analyzes 24:23	approved 79:4
ads 27:4	agreement 5:14 57:20, 22 78:21	altogether 34:24	angry 57:8	argue 23:4 42:3 53:11
advance 79:11	ahead 79:17	Amazon 36:14	animus 74:4	argued 7:11 22:5
adverse 73:17	aided 40:13	ambiguous 29:19	anti-	argues 8:17 9:7
advertisemen	alarming 12:15	Amended 5:6 7:14 15:17 40:2	american 31:15	arguing 6:9 53:5
ts 69:8	alcohol 25:24	amendment 21:20 26:9, 11 28:3,9 39:19 74:17	Anti-slapp 5:18 9:21 24:25 46:23 54:6,17 55:2 64:1 68:18 69:15 75:13,21	argument 13:10 21:12,25 44:21 45:6, 12 51:22 60:10 61:5, 16 76:1,25 77:3 79:12
advisement 13:11 79:18	allegation 50:6 73:8 77:14	amenities 55:7	anymore 72:23	arguments 4:21 51:19 53:1 60:9 76:13
advising 15:2	allegations 38:20 53:1, 2,19 55:16 58:4 75:23, 24	America 38:6 44:1	apologize 79:22	arrested 24:3 61:2
Advisor 9:15 12:15 13:19 14:3	allege 45:20 49:11	American 46:9	apology 26:8	article 12:18,22 13:3 14:21, 22 16:22 65:16,23,25 66:25
affidavit 10:11 12:1, 2,3,8 13:3 16:6 62:21, 24 68:15	alleged 29:16 32:2 41:1 43:24 53:16,23 56:13,22 70:18	amount 18:5 25:5	apparently 7:12	articles 10:10 12:24 18:11,15 20:14 23:22 29:6 47:13,
affiliated 30:2	alleging 39:13 76:2	ample 30:4	appearance 4:16 8:6 72:2	
affirmative 75:15	allowed	amplified 39:11 40:3 58:14,17	appearances 4:9	
afternoon 4:23 6:3 27:12 81:23 82:9,23		amplify 39:23 77:24 78:7	appearing 4:25	
		amusing 45:9	applies 32:1	
			apply 10:3 28:10	

24 48:12	47:17	69:10,11	bizarre	briefing
50:2 63:1,5		beaten	31:4	46:16 52:3
64:6,16,19,	<hr/> B <hr/>	30:21	blamed	briefly
24 65:11	B-E-A-U-H-A-	Beauharnais	6:18	70:2
asks	R-N-AI-S	54:12	blames	briefs
39:7	54:13	beclovn	68:4	42:4
ass	back	40:21 45:23	blaming	bring
57:4	9:6 13:8	began	14:15	33:21 45:5
asserted	47:20 68:14	65:20	bleed	68:12,15
50:20	73:7 75:4	beginning	33:11	broad
assertion	background	39:16	blogger	28:3 36:19
34:17	15:8 25:6	begrudge	60:2	broader
assertions	backtracking	28:16	blood	62:7
58:12	61:13	behalf	40:12	brought
asset	bad	4:25 5:3,8	board	50:24 55:7
30:22	34:24 44:23	6:4,16	29:21 61:18	58:9 80:21
asshole	45:1 61:24	14:12	boasts	bud
56:25	Baird	Beijing	38:13	59:2
assist	24:19	43:21 49:12	bogs	build
11:15	banded	belief	34:5	58:11
astounding	55:3	30:1	Bond	burden
38:9	banner	beliefs	17:14,15	25:2 54:4
attached	8:10 29:23	7:12	18:2,4 45:8	burdens
12:4,6 47:7	61:19	believed	book	60:6
attaches	Bar	72:10	26:19,22	business
38:10	49:19	Believers	boundaries	41:23 53:25
attempt	based	66:1	72:8	60:24
45:11,15,23	8:21 19:25	believes	bounds	<hr/> C <hr/>
52:25 53:11	34:11 49:25	40:11 63:21	68:6	calendar
attempted	50:5 64:14	benefit	Bowman	79:25
58:24	bases	30:22	4:11	calendars
attend	53:17	benign	break	30:9 81:25
30:13,17,19	basis	56:9	38:2 44:2	California
attorney	38:25 48:3	besmirch	77:15	81:7
39:2 43:4	49:20 50:12	40:21	breaths	call
attorneys	53:20 60:21	big	19:20	21:18 44:11
4:16	76:25	41:6	bribery	49:15
audience	battle	bit	52:17	called
39:10	40:14 55:7	19:20 54:23	briefed	21:19 25:20
aware	battlefield		35:24	

32:19,23 37:1 40:4 41:7 46:2 56:24 57:3 66:17 calling 42:10,16 43:16 49:8, 10 calls 49:4,23 calm 19:20 campaign 55:8 campaigned 55:4 cancel 41:23 capable 36:23 48:7 Capitol 37:16 77:5 care 80:15 career 13:17 carried 79:24 case 4:5 16:18 17:5 19:5 20:3,4,15 22:15,17 23:2,4,19 24:7,8,19, 21,24 25:1, 15,16,17,18 26:1,3,7, 11,15,16 27:6,15 32:15 33:20	35:22 36:3, 12,15,19,25 37:4 39:16 40:1,6 44:15 45:4 46:6 47:10 49:9 51:9 53:21 54:6, 12,14,24 55:10,23 56:1,9,10 57:19 58:1, 10 60:5 61:5,10,13 63:13 66:23 69:6,12 70:18 76:23 79:23 80:4, 9,21,24 81:12,18 82:15 cases 16:18 23:8, 14,17,19 27:15 33:3 36:2 caught 4:18 caused 45:25 causing 55:20 caveat 70:16 CCP 44:1 49:13 CCP's 43:22 Central 42:14 70:11 certify 24:16	challenge 53:19 54:19 56:13 59:23 73:22 challenged 74:1 changed 67:15 chapter 42:24 70:12 character 17:15 45:8 charge 29:22 31:20 charged 38:23 charges 52:10 77:1, 2,3 children 40:13 chill 54:9,18 Chinese 44:9 chooses 71:22 chose 39:19,22 59:2 Circuit 36:15 circulation 58:6 circumstance 24:6 circumstance s 6:24 22:16 24:9,11 25:18 26:2	circumstanti al 57:17,24 cite 12:9 14:21 16:18 63:1 66:23,25 cited 16:23 18:11 25:12 47:8 52:16 53:21 54:14 55:23 56:2 58:1 61:5 63:13 64:16 cites 36:2,14,25 37:5 citing 36:8 56:18 city 52:17 claim 22:4 39:18 53:15 55:13,14,21 56:8 63:23 claimed 7:8 49:1 claims 38:15 53:6 54:21 59:20 72:15 classificati on 22:15,16 clean 61:25 clear 22:11 24:15 29:13 42:9 78:17	clearance 65:20 client 6:12,20 7:12,14,17, 23,24 8:9 16:2 28:23 31:1 43:5 67:16,17 client's 6:14 8:23 clogs 34:4 CNBC 21:1 CNN 47:5 48:1, 12 64:2 71:11 co-counsel 4:18 23:10 82:11 co-occurring 33:4 cobbled 47:20 Code 31:21 codefendant 80:20 colleague 30:3 Collins 5:3,8,25 6:3,4 7:21 11:3,9,15, 20,22 13:13 14:1 17:13, 17 18:3 19:22,24 23:7,16 24:17,20
--	---	---	---	--

62:6 64:4 78:14,20 82:3 colloquial 31:22 combined 22:24 comment 23:5 29:6 32:4 34:23 70:25 72:4 commentary 32:4 commentating 71:12 commenting 71:1 comments 49:23 59:12 committed 52:10 committee 27:3 common 31:8 42:11 communicatio ns 59:10 communism 44:19 communist 43:20 44:9 48:23 49:1, 2,4,9,15 communists 43:16 community 16:24 55:4 company 76:14	comparable 34:7 compare 61:12 compared 56:9 competent 76:25 complained 72:18 74:11 Complaint 5:7 6:9,10, 11 7:5,6,8, 10,11,14, 16,19,21,23 8:1,8,16,20 9:2,7 14:1, 5,8 15:15, 17 16:9,12 17:4,19 22:1 26:15 27:2 32:2 38:10 39:3 40:2 69:7, 25 70:1,24 71:2 74:21 75:12 concern 28:12 concerns 6:16 7:9 conclude 29:25 68:8 69:20 74:21 concluded 26:6 82:24 concludes 82:22 conclusion 27:10 conclusions 23:23 28:23	29:4 conclusory 73:20 conduct 34:16,17 43:13 conducting 68:10 conference 5:13 79:2, 24 80:9,25 81:13,18 82:15 confines 74:6 confirm 5:10 conflict 24:16 connected 70:25 74:10 connections 73:18 consequence 31:9,19 53:14 55:21 74:14 consequences 52:7 conservative 7:17 43:15 considered 39:17 44:25 45:13 consistent 71:19 75:13 77:12 conspiracy 46:4 66:1 constitute 29:10 61:7	construe 5:21 46:23 construed 6:24 contact 67:14 contempt 52:12 contend 58:7 content 48:12 64:20 contested 19:15 context 17:3 24:5, 25 45:9 70:22 74:6 77:9 contextualiz e 67:21,22 continue 7:20 33:13 80:18 contract 55:6 57:21 contractor 21:15 contrary 45:19 controlled 14:10 40:11 controlling 24:9,10,22 controversy 24:2 conversation 29:3 71:9 core	26:10 27:14 corner 45:23 corners 6:9 7:4,9, 10,25 8:19 9:2 17:18 26:14 46:25 69:25 75:12 correct 5:16 10:2 24:17,20 couched 41:15 councilman 52:17 counsel 9:25 11:1 23:10 27:8 35:14,18 56:17 60:19 61:22 62:13,17 64:10 66:10 67:15,21 68:9 75:3 79:3 count 56:1 counter 10:7 counterclaim s 80:23 counterevide nce 62:11 64:8, 10 counters 10:8 20:7 country 27:17 28:13
--	---	--	--	--

31:10,14,23 41:11 45:14 coup 40:12 couple 9:25 19:19 23:8 court 4:2,4,15,22 5:2,5 6:2 7:7,20 8:4, 20 9:20,22, 25 10:2,4, 7,11,13,21, 22,23,25 11:4,5,7, 10,11,12, 16,19,21, 24,25 12:6, 12,21 13:5, 7,24 16:11 17:5,6,10, 16,20 18:1 19:15,19,23 20:8,24 21:4,23 22:19,22 23:1,13,15, 18,21 24:4, 14,18,22,23 25:4,16 26:5,13 35:6,13,21 36:3 40:6 43:14 44:7 47:23 48:5, 10,21,24 49:17,23,24 50:13,14 51:5 52:16 54:14 56:7 57:12 58:1, 3 61:8 62:5,13,18,	20,24 63:8, 14,25 64:5, 15,17,19,23 65:1,9 66:14,18 67:6,20,22 68:8 69:4, 19,20,23,24 70:4 71:5 73:24 74:13,16,24 75:8,11,22, 25 78:17 79:13,16,17 80:8,15 81:3,11,16, 21,23 82:5, 8,13,22 Court's 6:8 9:1 52:15 78:25 courthouse 35:10 courtroom 69:11 courtrooms 34:5 courts 23:24 27:17,25 28:14 63:17 65:1 cover 53:17 82:12 Craig 4:24 crazy 41:9,25 46:1 57:4, 11 create 28:21	creating 28:8 30:9 crime 37:22,24 52:11 72:20 77:8 crimes 34:19 44:3 critical 33:10 criticism 34:25 cross 36:9,21 37:12 71:16 73:10 80:23 crossed 42:17 44:4, 13,16 52:5 crosses 37:9 crossing 70:13 cryptic 65:20 curtail 69:15 <hr/> D <hr/> D.C. 30:12 Daily 18:13 21:1 65:13,25 66:25 damaged 41:1 53:25 54:2 damages 7:7 18:19	43:3 53:16 55:20 dark 17:25 45:22 date 75:7 80:7, 10,11,20 81:19 82:7 day 14:13 51:25 67:25 68:12,13, 15,16 days 9:16 30:10 75:6,10 79:9 81:18 DCA 24:8,13 25:16,21 dead 57:2,8,10 deal 16:19 38:6 55:18 67:21 77:19 dealt 27:1 death 44:3 decade 39:7 December 75:5 decided 31:5 77:24 decline 47:24 dedicated 7:15	deep 19:19 65:21 deeply 25:9 defamation 6:23,24 8:18 22:4 26:1 28:21 36:5,12 39:4 43:1 44:5,15 45:3 52:5, 6,9,18,23, 25 53:6,12, 13,15 54:10,20 56:12 59:19 61:7 73:22 74:2,6 76:22 defamatory 30:16 39:24 45:20 47:8, 19 56:19 58:10,12 63:19,22 70:19 defamed 43:1 defend 44:14 62:3 77:22 defendant 4:25 5:4 22:23 35:24 37:5 39:15, 25 40:17 52:24 55:17 62:8 74:23 75:15 80:3 81:5 82:3 defendant's 11:13
--	--	--	---	--

defendants 5:18 37:12 42:3 43:18 44:15 45:18 53:18 54:7 55:25 57:16 59:5,21 68:18 76:6	describe 43:25	differences 23:5,6	41:25 46:20 51:23 60:3 68:10 75:16	21:8 26:18 68:13 76:16
defendants' 46:19 52:21 58:7 74:20	describes 8:16	differing 28:25	discuss 25:15	disputes 69:18
defending 14:15	describing 36:6	difficult 45:24 57:14,22 74:18	discusses 12:14	disputing 13:25 57:12
defense 4:22 48:19 50:3 60:15 67:3 73:23	description 58:8	digging 38:16	discussion 26:21	disregard 42:18
defenses 75:16	deserve 44:6	digital 33:25	disgrace 52:12	dissenting 33:11
defiant 59:14	designated 46:17 72:9	dinner 42:1	disgraceful 44:3	distain 35:1
definition 54:11	designed 54:9,18	DIN 11:16,17	dislike 35:1	district 55:5 56:2
definitively 29:24	destroy 65:22	direct 12:12	disloyalty 31:15	distrust 52:12
degree 13:21 74:4 78:22	detail 78:10	directing 67:9	dismiss 5:21 6:5,8 11:17 24:23,25 25:3 36:1 40:8 43:12 46:19,24 64:1 69:25 74:21	DNI 9:11
Democrat 22:7	determination 8:20 48:8	direction 28:13 43:22	dismisses 81:17	doctor 56:4,5 57:10
denied 35:22 46:20 60:7	determine 17:22	directly 37:18 73:23 74:1 77:6	disparaging 36:20	doctored 57:2
depending 80:5	determined 14:9	directors 29:21 61:18	dispositive 44:7	documentatio n 65:14
depicted 72:25	determines 8:17	disagree 32:9	disproven 36:23	documenting 38:17
deprive 33:13	detractors 18:14 65:9	disagreement 33:15,17	dispute 20:22 24:12 26:16 30:24 36:16 48:6 51:11 63:5 66:4 75:22	documents 10:11,22
derogatory 44:20	developer 55:4	disclose 14:24	disputed	DOJ 27:22
	development 55:5	disclosed 21:10		Donald 7:18
	DIA 38:2 77:16	discourse 29:7 33:8 74:19		door 35:8
	dictionary 31:5	discovery 35:23 38:18		double-down 24:18
	difference 51:20			drape 22:10

drawn 28:23	efforts 55:9 57:6 81:10	39:7,8 52:14 57:4, 7 58:6 60:20 77:17,19	42:16 espionage 46:13	75:2,18 exclaiming 56:15
drink 40:12	election 8:11		espouses 71:17	Excuse 56:25
driven 26:16	elementary 29:8	endorses 67:2	espousing 72:11	execute 30:6,14
drug 25:21,23,25	elements 55:20	enemies 27:5	essentially 44:21 75:8	exhibit 11:9,23,24 12:13 40:7, 9 42:8 62:22 65:15,24,25 66:16
due 62:12	Eleventh 36:15	engage 33:12	ethereal 72:8	
dump 50:12	email 60:15 79:2	engaged 13:16 81:6	ethnic 6:18	
Duval 55:23	emphasizes 38:12	engagement 12:17	events 30:11 36:7 72:1,12	exhibits 11:18 12:2, 3,6 14:22 18:23
<hr/> E <hr/>	employ 46:10	engagements 41:3,23	evidence 10:7 13:6 17:19 18:12 20:4,6,13, 17,18 21:3 22:2,3 25:5 30:4 38:19 47:3,5 51:24 54:4 56:16 57:17,25 58:6 62:13, 14,16,23 63:3 64:11, 23 68:12, 14,17,19,22 71:4	exist 51:4,6 existed 24:2 exists 20:1 48:25 67:14 69:15
earlier 51:18	employee 6:14,22 7:22 10:17, 20 14:17 16:4 21:11, 13 39:13 41:20 49:12 58:22 59:25 61:21 67:20 68:7,24 78:5,6	enjoying 57:7 ensnared 69:16 ensure 69:16 entangled 27:24 enter 57:20 enters 81:16 entitled 7:1,2 34:1 68:18 76:20 78:12 entity 14:10 envisioned 55:1 epic 40:14 equivalent	evidentiary 5:19 29:11 evil 44:19 examples 37:5,8 44:17 exception 32:3 51:2	expect 28:1 34:9 44:14 expected 28:3 expedited 68:19 expensive 69:17 explains 40:10 exporting 14:11 expressed 61:22
earn 45:25				
easier 23:17				
easily 22:6				
editorial 12:14 15:2				
editorials 47:6	encompassing 28:4			
editors 47:13	encouraged 30:13			
Edward 38:2 77:15	encouragemen t 30:18			
Effectively 25:13	encouraging 30:17			
effectually 68:21	end 33:20 36:18 37:20,23 38:4,5,7,8			
effort 7:24 27:18 40:20 55:10 69:13				

expressing 32:5	49:12,15 50:3,4,6, 11,22 51:6	falsity 74:8	filed 5:6 6:5 8:22 21:24 63:14 75:9 78:24 80:22	fixed 79:9
extent 9:9 23:1 30:13 74:9 78:4	53:25 56:6 58:12 59:11 60:1,12,22 61:2,3,6,14 62:2,10 64:18,22,25 67:1 70:20 76:11,16, 19,22 77:21	Falwell 72:24		flavor 47:21
extradition 12:19		fame 9:13	filing 79:3,4,5	flew 41:11
extreme 73:6		familiar 42:8 54:25	filled 33:18	floated 66:2
<hr/> F <hr/>		famous 9:10,11 60:4	filter 41:9	Florida 13:1 25:14 27:16 42:14 52:14 57:19 70:11
F'ING 56:24,25	facts 9:24 10:6 13:14,15 20:7,22 24:1 26:18 36:7 38:15, 22 48:6,13 51:10 59:9 68:14 76:19	fanciful 72:21	filthy 61:23	Flynn 4:6,13 6:12 7:2 8:7,13 9:8,13 10:6,18 12:14 13:5, 16,19 14:6, 14,23 15:10,18, 20,22 16:3, 8,13,20,25 17:2,7,8 18:14,15, 19,21,22,23 19:6 20:2 21:6,18,25 22:6,7,8 23:20,25 25:7,8 26:20,21 27:1,2 30:6 37:6,13 39:6,13 40:17 42:16 43:24 45:10 46:3 53:23 56:16 57:4 58:9,20,21 59:25 60:12 61:2 65:4,
F-WORDS 57:1		fantastic 70:8	final 28:25 74:24	
face 8:19 16:8 17:18 22:8 25:11 74:21 77:12		far-right 40:10	financial 56:24	
facilitating 68:3		February 65:15	find 21:4 33:21 64:20,21 66:14 69:23	
fact 7:11 8:21 9:14 12:8, 24 13:18 14:2,3,5,8, 25 15:3,4, 10,12,21 17:5 23:23, 24 28:5 30:18 35:2 36:11,22 37:10 38:10,20 39:12,22 41:14 42:5, 13,18,19 43:1,7,9 45:21 46:18 47:20	factual 36:17 37:3 38:20 47:9	federal 16:18 27:17	finding 64:2	
	failed 47:16 53:18	feel 80:16	findings 23:23,24 64:25	
	fair 13:13 26:8 34:23 72:4 73:19	feelings 32:18	fine 6:1 80:13 82:5,10	
	fairness 26:9	Fight 66:21	fines 35:6	
	false 31:24 36:18,22 37:9 39:11 42:5,17 43:7 49:15 53:24 58:12 62:2	figuratively 31:6	fire 28:8	
		figure 13:21,22,23 15:13,24 21:7 25:8,9 26:24 33:16 65:18	Firm 4:12	
	falsehood 55:13,15,16 56:8 59:20	figures 7:17	fit 54:6,16 58:8	
		file 47:3 50:13 78:25 79:16,17	fits 49:9	

7,10,18 66:2,8,11, 21 67:2,8, 11,17,18,23 68:11,16,25 69:9 72:10 76:3 Flynn's 6:20 15:3,8 19:16 25:12 39:2 45:21 56:23 57:2 67:7 68:5 69:12 78:8 focal 51:8 focus 6:8 folks 18:7 20:25 46:7 58:15, 19 59:7 65:3 67:9 69:5 follow 32:13 71:24 fond 43:16 fondness 44:19 Force 40:14 forcing 33:12 foreclosed 34:15 foreign 21:9,10 43:23 60:23 68:4 foreseeable 56:3	form 57:22,23 63:1 formulate 63:11 forward 35:23 46:20 62:11 68:12 found 18:25 21:8, 9 25:21 28:15 37:2 52:16 65:9 66:18 founded 7:14 37:14 founder 46:14 founders 27:25 framework 35:16 fraud 57:18,19, 22,23 free 6:21 7:2 8:23 54:9, 10,19 FRIDAY 4:1 fringe 40:10 front 11:10 19:9 full 57:1 full-blown 75:17 fund 67:3	funds 21:18 future 80:1,7 <hr/> G <hr/> G-E-R-T-Z 54:13 gamesmanship 75:2 garden- variety 53:12 gather 72:12 gave 58:23 general 4:13 6:11, 20 7:2 8:7 9:8,13 10:6 13:5,16,19 14:6,14,23 15:3,8,10, 18,20,22 16:3,13,20 18:14,15, 19,21,22,23 19:16 20:2 21:6,18,25 23:25 25:7, 8,12 26:20, 21 27:1,2 30:6 37:6, 13 38:5 39:2,6,13 40:17 42:16 43:24 45:10,21 46:2,10 53:23 56:16,23	57:2 58:9, 21 59:24 61:2 65:4, 7,10,17 66:8,11,21 67:7,8,10, 17,18,23 68:5,11,16 69:9,12 76:2,15 78:8 generally 56:13 57:6 Generation 17:12 gentleman 39:20 55:12 gentleman's 57:8 George 4:24 Gertz 54:13 get all 70:5 ghost 57:5,11 give 11:12 70:4 71:25 giving 16:20 glare 9:1 gleefully 56:15 glossed 77:2 good 4:23 6:3 27:12 45:3	48:17 53:14 56:7 82:23 good-faith 49:20 governed 24:24 25:1 government 6:17 9:8 14:5,9,11, 12,16 15:1, 5 21:17 30:23 32:21 40:11 41:17 46:11 65:19 Grand 70:11 grant 69:21 74:20 granted 69:24 granting 69:22 Gray 52:15 great 35:3 68:1 group 46:17 55:2 61:18 71:21 72:9,13 growing 41:6 guess 59:6 60:11 66:12 72:8 guesses 59:8 guidance 29:10 guilty 34:18
--	---	--	--	--

Gundel 24:7,21,24 25:1 54:24 guy 34:24 61:20 <hr/> H <hr/> half 11:12 halfhearted 45:6 hand 63:4 handling 81:5 happen 61:24 happened 62:12 happening 9:3 27:7 happy 22:17 harm 44:1 hate 57:9 74:8 75:1 hatred 40:21 52:12 74:5 haunting 57:5,11 head 39:23 57:15 hear 22:19,23 24:12 52:1 78:20	heard 68:11 81:10 hearing 13:6 27:11 31:11 53:5 75:4,7,18 79:10 82:14,22 hearsay 50:17,23 51:2 held 4:1 56:2 58:3 Helen 57:4 helped 18:25 30:6, 14 37:16 helpful 42:7 helps 51:15 Hey 75:4 high 32:20 high-level 65:19 high-ranking 34:21 highly 15:25 55:11 Hill 14:23 15:1 history 15:3 25:6, 13 26:20 68:5 73:14 hit 47:4	Hitler-like 37:2 61:11 71:15 Hold 81:24 holding 53:21 Holocaust 37:21 homeowners 55:3 honor 4:10,17,21, 24 5:8,19, 20 6:1,3 11:23 16:5 19:14,24 23:7 27:11, 13 33:19 35:12,20 36:2 39:18 41:5 46:16, 23 48:18 51:1 52:8 54:24 56:25 57:19,21 59:20 62:4, 6 63:13 70:1,2,7 74:25 75:4, 20 78:13, 14,24 79:15,22 80:12 81:4, 8,21 82:2, 7,19,20 Honor's 80:6 honored 4:12 horrible 33:17 61:24	horse 30:21 host 16:14 17:22 house 6:15 41:12 Huffman 4:10,11,17 5:17 22:25 35:20 48:17 49:8 50:1 70:2,6,8,21 72:6 74:25 81:4,20 82:6,10,18 hundred 59:12 hundreds 42:21 hurt 19:2 32:18 hurts 59:13 Hustler 36:2 72:23 hyperbole 21:6 36:4, 10 73:5 77:11 <hr/> I <hr/> idea 31:7 73:5 75:14,19 76:2 77:13 ideals 71:17 ideas 69:10,11 71:19	ideology 72:11 ignore 32:10 images 38:10 imagine 32:19 57:12 impact 19:2 impacted 22:2 impacts 41:2 Imperial 42:14,19,23 43:5,9 70:11 importance 26:4 74:17 important 20:8 21:22 23:21 24:4 26:13 52:1 62:18,22 63:2 66:9, 10 67:13, 20,22 69:3 70:16 importantly 52:24 impose 35:6 impossible 73:3 improbable 58:4 inapplicable 54:22 inappropriat e
--	--	--	---	--

27:5 31:2	inhibiting	14:4	7:9,10	21 47:24
included	8:23	interest	13:17	48:4,5 50:8
66:17	injure	30:25 71:13		63:8 64:3,4
includes	40:22 52:13	74:20	J	junction
37:22,25	55:12 62:2	interesting		54:1 80:20
52:9 70:24	injured	9:10 70:21	jail	Justice
77:8	68:11	72:5	15:19,21,23	41:10
including	injuries	interests	56:16,18,19	
36:2 39:12	46:1	34:22 53:25	James	K
increasingly	injurious	interim	17:14,15	
43:16	43:13 45:21	81:16	18:1,4 45:8	Kavanaugh
incredible	55:13,15	interpretati	January	41:10
53:3	56:8 59:20	on	4:1 30:7,11	keeping
independent	innocence	21:21	37:16	6:8
21:14	34:12,14	invaded	jeopardy	kill
indicating	insane	68:1	78:9	41:12 72:19
9:18	31:7	invades	Jerry	kind
indicted	insert	14:14	72:24	41:2 42:9
9:16 14:4	39:22	invasion	Jim	47:19 53:24
individuals	inside	6:19 68:3	4:6,25	54:25
69:4	57:14	involved	Jinping	60:16,20
inevitable	insider	25:9 28:1	43:22	77:2,23
43:12	65:19	30:2 69:8	job	78:11
infamous	insist	involves	35:15	kinds
46:15 52:11	59:11	25:18	Johnson's	40:24 41:13
60:2	instance	issue	26:6	51:6,16,17
inference	29:17 30:8	7:1 13:9	join	58:10,16
30:5 34:20	34:12	26:7 48:18	4:19	KKK
73:18	instances	50:7,9 54:5	Jonathan	42:24
information	29:15 32:3	70:17	4:11	Klan
9:20 18:6	instrumental	78:15,21	judgment	42:15 43:6
20:1,18	ity	80:3,5	5:12,22 6:6	70:12 73:9,
29:1,5 33:7	21:16	issued	8:25 10:2,	12,14
38:16 40:15	insurance	6:12,13	3,14 46:22,	Klux
48:2 52:19	75:22	15:2 25:10	24 47:3	42:15 70:12
informing	intend	67:23	68:9 69:21,	73:9,12,14
15:7	28:1	issues	22,24 75:3,	knew
inherently	intent	14:14 23:11	18 76:20	20:11 47:15
58:4	57:21	26:12 51:14	79:8,15	65:4
inhibit	interactions	76:16,17	judicial	Knights
7:24 69:14		items	10:21 11:2,	42:14
			4,24 12:7,	

knots 62:19	lawsuit 8:22 34:4 43:13	lengths 68:1	37:19 46:10	lot 35:10,16 71:14
knowledge 38:14,15 74:7	lawsuits 33:3,12	lengthy 6:5 67:24 69:17	literally 29:22 31:3, 5,6,7 38:8, 13 42:21,23 43:20 72:19 77:20	loud 32:12
Kremlin 41:21 58:23 59:25 61:21 77:18 78:5	lawyer 28:19	Leonard 5:3 6:4		<hr/> M <hr/>
Ku 42:15 70:12 73:9,12,14	lay 24:1 81:1	letter 43:4	litigating 34:5	made 23:24 34:17 42:17 47:18 50:23 57:3 61:12 66:6 67:17 73:8 74:11 76:10
<hr/> L <hr/>	laying 35:16	level 9:12,13 29:9 32:20	litigation 48:24 59:22 66:8	
	lays 13:15 25:5 67:13	Levy 53:21	live 31:3	magazine 72:23
laid 30:4	leader 46:14 71:21,22,24	libel 36:5,12	livelihood 45:22 78:9	Mail 18:13 21:1 65:13,25 66:25
land 52:20 81:1	leading 29:22	liberals 43:16	lives 33:22	
landing 4:19	leaps 17:22	lie 56:8	living 45:25	major 13:22 15:13,24 26:3,23 40:25
language 34:14 52:15 79:6	Leavitt 56:1	lied 34:23 56:5	LLC 4:7	make 8:20 13:9, 10 23:17 39:21 45:23,24 48:12,15 50:5,10 59:12 60:21 62:3 64:2 77:1 78:10
lapdog 76:8	left 44:18,25 79:21	lies 7:17 55:11 56:9	lob 31:14	
larger 39:10,25 40:1	leg 55:6	life 32:20 78:9	local 42:24 71:11	major 13:22 15:13,24 26:3,23 40:25
laughed 43:14 44:7	legal 19:1 27:18 31:9,19 39:5 51:19 53:1 59:3 60:15 67:3 69:17 74:5	light 52:21	logic 32:1	make 8:20 13:9, 10 23:17 39:21 45:23,24 48:12,15 50:5,10 59:12 60:21 62:3 64:2 77:1 78:10
law 4:12 16:18 17:5 20:3, 4,15 22:15, 17 23:2,4, 23 25:14 36:19 66:24 68:18 69:15 76:20	legally 29:16 53:17	liking 28:16	long 5:25 33:24 36:21 58:19	major 13:22 15:13,24 26:3,23 40:25
lawful 54:19	Legislature 55:1	limit 73:1 75:24	longer 28:9	make 8:20 13:9, 10 23:17 39:21 45:23,24 48:12,15 50:5,10 59:12 60:21 62:3 64:2 77:1 78:10
	legitimate 6:16,18	Lincoln 18:24 26:25	lose 51:21,22 53:20 55:25	major 13:22 15:13,24 26:3,23 40:25
		list 23:19	loser 56:25	major 13:22 15:13,24 26:3,23 40:25
		listen 76:13	lost 37:1 55:19	major 13:22 15:13,24 26:3,23 40:25
		literal		making 4:16,20

37:19 38:23 49:19 56:4 60:22 malevolent 57:5,11 malice 15:15 16:2 43:2 53:15 55:22 56:11,14, 17,21,22 57:13,16 58:7 74:4,5 maliciously 62:1 man 40:18 41:11 58:5 management 79:23 80:9, 25 81:12,18 82:15 manner 24:22 73:21 77:25 manners 34:2 March 81:23 82:8 marketing 72:11 markets 71:18 master 44:20 material 9:19,24 10:5,8,12 11:10 64:21 68:14 materially	73:17 materials 5:19 11:14 12:9 14:19, 20 16:12 23:14 38:24 46:25 47:7, 18 50:19 51:6 53:8, 9,10 75:11 matter 32:10 42:5 50:19 62:9 76:20 81:21 matters 24:5 25:10 28:11,12 29:6 30:25 50:25 71:13 74:19 meaning 16:10 17:7 meaningfully 53:19 meaningless 16:9 17:1 means 8:17 17:17, 21,23 21:17 22:10,13 43:2 46:19 meant 29:20 56:17 73:4,5 media 35:9 41:8 47:11,14 58:17 71:9 Meidastouch 4:7 40:4 member 34:20 73:9	members 73:11 mention 8:7 23:8 mentioned 60:15 mentions 13:2 merchandise 16:16 19:11 66:12,20 67:2,7,10 mere 36:3,10 42:4 49:15 61:8 merit 54:8,18,22 merits 59:22 messages 65:21 met 25:2 60:6 76:21,22 Michael 4:6,13 12:14 Middle 56:2 Mike 38:8 67:1 72:19 77:20 military 32:21 34:21 38:3 77:16 million 19:8 40:5 58:18 69:7 mind 15:7	minister 43:23 44:12 45:1 minutes 79:21 82:15 mis-found 20:10 mischaracter ized 62:17 misfortune 56:24 misled 34:23 mitigating 59:10 mocked 56:23 mockery 45:24 mom 57:10 moment 9:7,22 monetary 35:6 monetize 40:24 money 21:15 27:4 71:25 month 30:10 months 52:4 53:4 81:12 mother 57:2,8 motion 5:12,21	6:5,6,7 8:25 9:21, 23 10:1,3, 13 11:17,18 12:4,6 24:23,25 25:3 36:1 40:8 46:19, 24 53:8 60:7 63:25 67:8 74:20 75:7,9,20 78:24 79:1, 8,14 motions 5:5 35:22 53:4,20 movant 79:7 move 35:23 43:12 46:20 moved 44:7 movement 16:14 37:14 40:10,18 41:19 44:22 46:15 71:22,24 movie 28:8 movies 17:15 multiple 65:7 murder 38:8 77:20 murderer 58:25 mysterious 18:7 65:18
--	--	---	---	--

<hr/>	nip	10,13 66:16	online	opposing
N	59:2	69:20,21	18:7 64:6	7:15 11:1
<hr/>	nonmoving	76:18	open	79:3
names	62:8	numbered	4:2 35:7	order
32:19	notably	12:5 38:11	48:24	13:4 17:6,
nasty	56:1	numbering	49:22,24	22 26:8
42:5	note	40:9	opens	38:3 63:1,
national	34:9 73:25	numbers	72:23	11 69:22
9:14 12:15,	noted	30:10	operate	77:16 81:8,
19 13:19	72:6	numerous	78:18	16
14:2,24	notice	38:11 56:15	operating	organization
15:13,24	10:21 11:2,	<hr/>	32:17	7:15 30:3
natural	4,24 12:7,	O	opinion	69:6 71:18
56:3	21 47:24	oath	12:10 18:10	72:7,15
nature	48:4,5	16:15	19:25 20:16	organization
9:9 26:4	50:8,14	objection	21:6 32:5	s
61:6 67:14,	51:3,5 63:8	5:24 6:1	36:4,10	73:16
25	64:3,5,18	objectively	37:3 41:15	original
Nazi	79:1,3	34:7	42:4 46:8	39:15
37:1 49:10	82:14	obligation	61:8 63:2,	ostensively
61:11	noticed	62:10 74:22	11,20 76:4	17:2
necessarily	21:24	obvious	81:20	outfits
25:22	notion	36:10 56:23	opinions	66:6
29:12,20	18:17	73:1	13:4 20:15	outlet
negative	notoriety	occasion	28:20	58:17
18:24	9:12	80:1	31:23,24	outlets
negatively	nowadays	occurred	32:8 33:14	47:11,14
26:19	42:12	76:15	34:2 36:19	outrageous
network	nth	occurs	59:8	43:13 47:19
14:8	13:21	75:5	opponent	51:17
news	nuclear	offer	13:24 19:2	outstanding
14:6 27:20	38:7 44:1	32:7 35:18	25:21	80:3
newspaper	49:13 58:23	office	opponents	overnight
10:10 16:22	60:1 77:19	81:4	33:11	7:13
20:14 23:22	number	official	opportunitie	overwhelming
49:3 64:16,	4:5 8:5	34:21 46:11	s	25:5
19,24 65:7	10:10 11:16	officially	opportunity	overwhelming
newspapers	12:11,12,22	46:17	19:3,4 27:9	ly
66:5	15:14	omits	35:17 60:3	28:14
nice	23:14,17,19	14:2,3,5,8	oppose	
34:6	33:3 62:21,		11:4	
	23,24 63:7,			

<hr/>	56:19 65:13	22 43:15	76:5,7	plane
P	71:20	44:2 46:1	pick	4:19
<hr/>	72:13,20	57:5,11	12:15	planned
P.M.	participant	58:18 62:1,	piece	77:5
4:2 82:24	71:20	3 71:11,23	62:22	platform
pages	parties	78:10	pieces	32:11 40:4
50:13 53:7	5:11 26:17	perceive	47:4	plea
paid	54:23 69:16	71:24	ping-ponging	9:18
21:7 37:18	79:6	percent	13:8	pleading
43:20 44:9	parties'	59:12	place	75:14
77:6	78:21	permitted	33:18 61:24	pleadings
paint	party	4:20 56:14	plain	51:22
45:22	20:15 26:11	person	5:15 9:3	pled
painted	62:8 63:21	4:25 18:16	27:6 57:15	9:17 34:18
73:1	81:2	22:9 25:8	plainly	55:20 73:21
panic	pass	35:3 36:7	21:16 22:14	74:2
28:8	23:9 27:8	49:24	52:22	pockets
papers	passed	52:10,18	plaintiff	40:23
71:11	55:2	54:2 63:16	28:16,22	podiums
paragraph	pastor	74:8 78:18	29:18 30:1,	16:21 19:10
6:11 7:13,	25:19	person's	8,12 32:17	point
16,18 15:17	patient	74:7	33:2,16	4:20 9:24
79:5	56:3	personal	34:13,16	11:25 14:19
paragraphs	payments	55:11	35:18 52:20	20:8 25:17
38:11	73:14,16	personally	55:14,18	33:6 35:12
pardon	pays	37:25 40:22	56:24 62:9	38:20 39:2
34:12,14,15	67:3	46:13 77:13	63:23 70:18	48:11 49:5
pardoned	pedophiles	perspective	72:18,19	51:3 52:4
15:11 24:3	40:12	32:17	73:13,16,20	60:20 62:7
pardons	Pence	pervasive	74:11	65:8 66:9,
34:11	38:8 72:19	32:25	82:11,18	10 70:8
paren	77:20	philosophies	plaintiff's	76:23
79:5	people	71:20	4:15 52:25	points
parlance	23:3 28:17,	photograph	73:7	51:8
31:8	18 30:13,	8:9	plaintiffs	policy
part	17,18 31:22	photos	4:8	68:4
9:23 14:15	32:12 33:5,	57:2,10	plaintiffs's	polite
26:18 29:3,	10,18 34:1,	73:10,12	72:15	26:7
21 31:13,17	6 35:2,6	phrase	plan	politeness
33:8 45:7	40:5 41:9,	76:9	30:6,14,15	26:9
48:19 50:2	23 42:1,10,	phrased	37:16	political

7:12 9:5 19:1,2 25:10,11,20 26:4,12,15, 16,23 27:3, 19,22,23 31:12,13,17 44:11 61:8 67:25 69:14,18 74:19	present 57:21 presented 25:4 71:5 preservation 74:16 president 9:15 13:20 15:11 34:13 37:1 40:13 65:22 presidential 34:11 presumed 43:2 53:16, 18 55:22 56:12 pretty 24:15 30:21 prevailing 27:21 previous 40:8 previously 35:14 primarily 54:9,18 prior 48:15 70:9 prison 52:20 prisoners 38:1 46:13 77:14 privilege 48:25 pro-russia 30:24 problem 40:25 41:5, 6,13 46:21	47:1,2 48:20 50:21,24 problems 6:18 procedural 29:11 proceed 5:7,9 6:1,2 11:8 proceedings 4:1 45:17 69:17 74:22 82:24 process 19:1 27:5 38:18 68:19 81:6,9 produce 68:16 produced 38:19 products 71:18 profession 28:20 52:14 professional ly 40:23 program 25:19,20 Project 18:25 27:1 promote 40:21 promulgating 10:16 proof 42:20 44:8 45:5,18 47:17 53:2	60:14 propaganda 14:11 38:5 43:23 proper 36:11 55:14 properly 80:21 propose 80:8 proposed 80:10,19 prosecution 34:15 protected 16:1 21:20 28:15 protective 28:4 provable 37:10 76:11 provably 29:14 31:24 prove 57:23,24 60:3 proven 36:17,23 57:17 provide 38:25 47:21 provided 38:24,25 76:25 79:11 provisions 55:6 public 6:25 13:21, 22 15:23 16:15 18:18,22	20:1 21:7 25:8,9 26:24 28:8, 11,19 29:7 30:4,24,25 33:8,16,22, 25 34:20,25 48:14 55:7 65:3,4 69:12,14 71:8,13 72:2 74:18, 20 publication 14:22 49:3 publications 20:16 21:2 48:15 50:10 63:6 65:8 publicly 29:2 35:2 37:13 43:8, 19 55:3 publicly- available 66:19 published 42:25 48:13 55:16 publishing 43:7 Pullum 25:16 26:3 punish 27:5 punishable 44:3 purchase 67:10 pure 59:7
--	--	--	--	---

purely 69:12,13		quote/ unquote 16:4	reach 40:1 58:15	rebuttal 22:21 70:4, 5
purported 65:19	Q	quoted 16:23 37:11 56:14	reached 29:4 75:3	received 34:13
purpose 38:18	QANON 16:13,19 18:1,4 22:1,9 29:19,23 37:14 40:7 41:19 44:22 45:7 46:15 60:13 61:18 63:24 65:6 66:1,13 67:2	quotes 79:7	reaches 40:4	reckless 41:13 42:18 53:24 58:5 60:11,12 61:1,3 78:11
purposefully 71:23		quoting 67:1	reaction 60:9	record 5:10,14 8:21 9:20 10:9 15:23 27:6 60:14, 24 62:14,17 63:12 64:14 65:2,3 66:14,15 67:6,13 68:21 78:16
purposes 8:22 27:19 63:25		R	reactions 59:4	records 73:15
pursuant 12:25 13:6		racist 42:13	readers 15:2,4,7	refer 23:16
pursue 60:3	qualify 28:6	racists 42:11	readily 20:24 36:23	reference 31:22
pusher 25:21,23,25	Quartermaste r 17:16	radio 25:19 52:18	reading 72:22	referring 45:8
put 41:7 49:18, 20 58:5,17 59:1 62:11 71:1 78:12 82:14	question 12:23 48:17 50:3	raise 27:3	ready 5:7,9 48:7	refers 12:2,3
Putin 6:14,21 7:22 10:17, 20 14:17 16:4 21:11, 13,14 30:20 37:19,23,25 39:6,14 41:21 46:12 58:24 67:20 68:7,24 73:13 77:7, 9 78:6	questioned 48:3,9 50:15 51:12	raised 35:14 69:7 70:8	real 19:3 33:25 47:3,5 52:25 75:16	refute 21:3 53:2
	questions 35:13	raising 52:4	reality 13:7 18:20	regard 9:19 12:10, 18 15:7 18:4 20:1 21:25 23:25 25:2 48:14 62:7 64:23, 25 65:6
	quiet 35:4	ran 12:22,24 18:11 63:5, 6,7 64:6	realm 21:6 37:2	
	quote 36:16,18 37:19,20, 21,23 38:1, 4,5,6,7,8 39:7,8,9 48:6 52:10, 14 57:3,4, 6,7 58:3,6 60:19,20 66:1 77:14, 17,18,19	rare 32:3	reason 32:24 45:3 47:11 70:15,19 73:25	
		rational 29:4	reasonable 19:5 20:16, 19,23 38:25 50:5 81:15	
		re-tweet 60:15	reasons 35:24 47:25 58:9	
		re-tweeted 8:3 18:20 19:7	rebut 27:10	
		re-tweets 71:19		
putting 5:19				

78:21,25	23:2,22	74:7	retracted	53:4
regional	71:2	reserve	46:6 59:6	RT
71:11	remark	22:21 35:17	retreated	14:7,9
regular	31:1	resort	59:5,6	21:7,15
25:8	remarkably	48:8	review	rule
regularly	34:7	resources	29:5,9	5:11 26:14
31:14	renege	33:12	reviewed	46:23 50:17
related	79:12	respect	6:12	51:2 75:3,
34:17	repeated	5:6 62:12	revisions	10 78:19
relationship	39:11	respective	28:7	79:7
16:24	replied	60:6	rhetoric	rules
relevance	39:5	respond	31:13,17	10:3 29:12
51:7 63:3	reply	35:17 43:8	44:4 51:20	49:19
relevancy	21:24 62:5	70:3	rhetorical	ruling
50:21	report	responded	22:14,16	13:12 79:19
relevant	48:25	6:21 73:23	69:2 73:4	rulings
15:6 16:5	reported	response	Ricci	13:10 80:6
63:18	13:16	6:20 14:18	4:12	run
reliable	58:20,22	19:1 22:24	Richard	18:24 27:4
20:23 63:19	reporter	25:12 54:15	52:15	35:10 69:7
64:2	49:22,25	55:24 58:2	Rick	running
reliance	reporting	61:4 75:6	4:7 5:4 6:4	29:18,20,22
49:3 63:15	37:18 41:21	76:24	56:13 79:1	37:14
70:23	77:6	responses	rid	runs
relied	reports	53:22	60:5 61:23	61:19 69:6
12:9 20:11,	14:6 49:22	responsible	ridicule	Russia
13 62:25	58:11	25:24 30:9	41:3 52:12	12:16 14:13
63:10 64:8,	represent	49:19	ridiculing	61:1 67:25
11,12,15,17	4:12	rest	36:20	68:4
71:6 74:9,	Republican	58:25	ridiculous	Russia's
13	17:3 22:7	restrictions	36:20 77:11	38:5
relief	Republicans	28:7	riot	Russian
44:8	7:15	result	37:16 77:5	6:17,19
relies	reputable	55:17,19	Roberts	14:4,7,10,
13:3 47:18	63:15 67:4	resulted	79:4	12 21:16
rely	request	25:11 38:16	role	30:23 40:20
35:13 48:14	48:3 50:8	results	34:25 68:2	41:17 43:17
50:18	requires	28:25	roll	45:14 46:3,
63:16,19	26:9 55:15	retired	13:13	11 76:8,9
relying	requisite	56:5	round	Russians
20:10,15,20				37:18 38:4
				77:6,17

S	sends 43:4	shot 46:22 47:2	sir 22:25 43:5 70:4,6	20:23,24 48:2,8 51:11,13 63:15,17,20 64:19 67:4
safeguard 74:17	series 27:15	shout 32:12	sit 28:24	Space 40:14
sales 25:24	serve 79:8	shouting 28:8	sitting 73:11,13 80:14	speak 26:12 80:1
satanic 40:12 44:11,13,25 45:2	served 9:8,14,22 14:2 32:22 80:4	show 16:23 20:17,19 51:3 52:18 54:8,17 56:20 68:13,17 72:1	situation 40:3 55:1	speaking 41:3 72:12
scared 40:13	server 81:6,9	showed 41:11	slogan 16:17 19:12 66:12,13	speaks 78:18
searched 53:7	servers 38:3 44:2 77:16	shut 55:9	slogans 19:17 66:20,22	special 38:14,15 81:8
seated 4:4	serves 38:4 77:17	side 43:15	smaller 39:18	specific 30:11 34:16 35:13 37:10 38:9,20,22 42:15 43:25 44:10 46:13 47:9 50:6, 11,22 51:8 52:17 53:24 55:11 56:6 60:8 76:10 77:1,21
secret 38:2 40:15 52:19 77:15	service 9:9 81:3,5	sides 31:14	Snowden 38:2 77:15	specifically 39:12 49:11 78:6
secrets 38:3,7 44:2 49:13 58:23 60:1 77:16, 19	set 49:21 75:4 80:10,19	signed 9:17	snowstorm 4:18	specificity 51:21
Section 48:4	share 34:2 38:3 77:16	significant 52:7 69:9	social 35:8	spectrum 71:10
security 9:14 12:15 13:19 14:3 65:20 78:10	shared 29:5	signs 19:10	sole 29:21	speculated 65:17
sees 67:6	sharing 35:2	silence 33:5,10	solid 44:8	speech 6:21 7:2,3, 25 8:23 16:1 21:20 28:5 32:7
sell 63:24	shift 54:4	silly 18:20 45:16	solution 61:25	
selling 16:16 19:17 44:1 66:11 67:2	shirts 19:17	similar 47:21 49:10 52:22 55:25	someone's 57:10,15	
sells 19:11	Shirtshow. com 67:9	simply 29:16 31:16 34:15	sophisticate d 39:20	
	short- circuit 59:21	single 13:9	sorts 33:18,19	
	shortage 28:19		source 64:2 67:5	
			sources	

54:9,10,19, 21 61:9 69:14 speeches 16:20 31:12 spell 54:11 spies 44:9 spread 33:13 55:11 59:2 spreads 7:17 spy 37:18 40:20 43:21 46:10 77:6 square 32:11 squarely 76:23 squares 33:25 stage 45:17 stand 17:24 34:1 52:23 stand-alone 15:20 standard 36:8 74:5 76:21 standing 19:9 80:17 Star 17:11 Starting 4:8	state 15:6 27:16 33:4 59:11 63:21 65:21 stated 49:2 55:14 78:23 statement 6:13,14,25 7:22 8:11, 12,13,15 9:23 10:5, 17,18,20 13:14,15 14:15 15:2, 9 16:7,8,9, 19,21 17:4, 8 18:18 21:11 22:12 25:10,25 26:6,23 29:10,12,24 36:16 37:9 42:17,25 43:7 49:14, 19 52:9 56:6 60:18 61:1,3,6 62:10 63:16,18 65:6,12 67:19,23,24 78:7 statements 9:17 10:15 15:14,23 18:13 20:22 21:22 24:5 26:5 29:16, 17 32:2 36:5,9,11, 22 37:7,11 38:9,12 39:1,12,22,	24 40:3,24 41:8,13 42:5 45:20 46:7,8,18 47:9,12,19 48:15 50:8, 11,22 51:16,17 52:21 53:24 56:20 58:8, 16,19 59:9 60:12,22 61:10,12,14 62:2 63:11 67:16 68:25 69:1 70:17, 23 74:11,15 76:4,11 77:10,21 78:11 states 6:19 9:15 12:20 13:20 14:9 15:12 23:20 31:21 34:19,22 62:25 68:2, 24 73:17 status 5:13 79:2 statute 5:18,20 54:7,17,22 55:2 75:13, 21 statutes 13:1 steal 49:13 step 49:11 81:1 Stewartson 4:6 5:1	8:2,12 23:10 27:9 29:4,18 32:4 35:25 36:14,24,25 37:13 39:5, 17 43:10 47:16 51:18 54:15 55:24 58:3 59:14 61:16 70:22 72:3,17 73:24 74:12,23 76:24 78:8 82:2 Stewartson's 8:4 16:25 30:1 53:10 56:22 61:4 70:25 Stewartsons 58:13 sticklers 75:10 stochastic 41:7 stole 58:23 60:1 stone-cold 61:6 stop 39:4 43:6 55:10 56:4 78:12 stories 72:25 straight-man 73:2 strange 52:3	stretch 21:17,23 struggle 32:16 stuck 33:23,24 stuff 40:20 43:17 45:12 59:1 72:11 76:8 77:25 stump 31:12 subject 18:22,24 26:21 33:2 34:4,25 35:1,2 36:12 47:10 48:6 51:11 52:11 66:3, 8 71:8 submission 51:24 submit 47:16 submitted 10:5,9,10, 11 62:14,16 63:3 64:10 substantial 25:9 subvert 69:13 successful 49:6 sue 43:8 sued 44:6 47:14 55:5,8 62:3
--	---	--	--	---

suffered 18:19	supported 14:23 16:6 72:14	<hr/> T <hr/>	25 18:6 20:21 21:21 22:13 24:1 25:6 26:4, 11 56:11 63:18 65:2 69:1	40:19 41:24 43:25 44:10,24 47:5,21 50:14 51:4, 13 53:16 59:11 60:9 61:24 64:12,13 69:19 70:23 71:8,14 72:17,22,25 73:3 75:23 77:12
sufficient 54:1	supporters 18:14 65:9	T-SHIRT 60:16 76:14	terrorism 31:20 41:7	thinks 72:24
sufficiently 36:16 37:3 73:21 74:2	supporting 54:3	T-SHIRTS 60:13	terrorist 31:18 37:17 46:17 67:18 72:9,14,16	Thompson 58:1
suggest 16:2 17:13, 14 18:15 30:16 34:3 56:17	supports 15:12 20:3, 5,15 22:15 47:8 68:22	taking 11:4 16:15 41:4 46:22 47:2 64:3,4 79:18	terrorizing 31:23	thought 64:22 70:20 72:5
suggested 30:7 70:10, 21,22 73:20 74:12	suppose 43:4 51:5	talk 9:9 13:18 17:5 24:7 37:7 52:2 54:23 57:4, 10 74:3	theater 28:9	thoughts 32:8
suggesting 17:10 71:15,16	supposed 38:14	talked 10:25 26:19 76:17	theories 27:22	thousands 42:21
suggestion 19:6 29:17 31:9 72:13	supposedly 43:25	talking 65:17 68:10 71:2	theorist 46:4	three-word 22:11
suggestions 66:7	Supreme 36:3 52:15 54:14 58:1	talks 7:6 8:10 12:8,16,17 63:14 66:24 67:1	theory 66:1	throes 15:25
suit 74:6 77:23	susceptible 36:17	target 62:2 81:19	thereabouts 54:15 55:23	thumb-drive 23:13
summary 5:12,22 6:6 8:25 10:1, 3,14 29:5 32:5 46:22, 24 47:2 68:9 69:21, 22,23 75:2, 18 79:8,14	switched 7:12	television 8:6 14:7	Theshirtshow usa.com 66:17	Thurlow 4:24
support 10:13 12:10 13:4 14:20 20:14,16 22:3 30:5 38:19 50:22 67:10	sympathetic 41:17,19	temple 44:13 45:2	thing 18:7 23:3, 12 34:9 39:23 43:23 44:23 52:1 53:10 64:5 70:25 71:2	thwart 55:8
	sympathizer 46:3 76:9 78:1	tend 58:11	things 8:5 11:22 21:23 28:17,18 32:23 33:1, 5,19 34:2, 6,8 35:7	tie 16:19 67:12
	sympathy 44:22,24 45:16	term 31:14		tie-in 76:14
	syndicate 37:22,24 72:20 77:8	terms 9:3 10:20 15:8 17:21,		tied 16:13,14,15
	system 27:19,23 34:5			

ties 12:16	37:7 44:4 51:20	69:1 70:15, 20 72:22 73:4 75:17	Tweets 15:20,21 37:6 38:11 56:15,19 59:7 68:22, 23	understandin g 11:3 72:7
time 4:17 11:5,7 22:19,21 24:2,3 28:6 35:8 51:13 63:7 65:5 79:9	town 32:11 trade 52:13 traitor 31:3,8,10, 15 37:20 40:20 43:17,21 45:14 46:3 61:20 traitorous 31:10 45:12 transnationa l 37:22,24 72:20 77:8 transpired 30:11 Trek 17:11 tremendous 18:5 29:3 35:15 tremendously 58:14 trial 80:10,11,19 trier 50:4 76:18 trouble 35:11 true 17:2 21:5 25:13 29:14 31:16,24,25 36:17 38:17 56:6,7 64:7,21	Trump 7:18 34:13 37:1 40:13 49:9 61:10 truth 20:21 47:8 50:19,25 59:13 truthfully 33:19 truthfulness 9:18 Tuesday 79:23 Turkey 12:17 60:25 Turkish 12:19 14:24,25 15:5 turn 16:7 27:20 TV 32:7 Tweet 6:12,13,15, 22 7:3 8:2, 4,5,8 16:25 30:17 66:3 67:8,23 70:9 Tweeted 12:11 15:18 30:12 32:6 39:3 65:5 68:7 Tweeting 71:12	Twitter 32:12 33:17,21 61:23 67:9, 24 two-word 67:19 type 57:18 types 28:5 34:10 <hr/> U <hr/> U.S. 14:16 68:4 ugly 77:3 Ukraine 6:18 14:14 68:1 ultimately 9:16,17 41:25 unambiguous 29:13 unavailable 79:23 unchallenged 58:14,16 undeniably 71:21 understand 23:21 48:11 69:4	understood 5:17 36:6 underway 81:10 undisputed 9:23 10:5 13:14,15 20:7 62:10 63:12 unfamiliar 40:6 unfortunate 31:13 United 6:19 9:15 12:20 13:20 14:9 15:11 23:20 31:21 34:19,22 68:2 73:17 unlawful 54:21 unreasonable 71:6 unreasonably 74:13 unsued 33:13 untangle 62:19 untrue 20:18 unusual 15:25 <hr/> V <hr/> vehicle
times 9:25 12:14, 25 18:11,12 20:25 47:4 48:1 65:12, 16,23 71:10 timing 5:12 title 46:11 55:23 77:18 today 68:9,12,13, 20 76:18 79:19,25 told 55:11 81:6, 7 82:11 tolerate 42:10 tolerated 36:21 top 38:2 77:15 torture 17:6 tortured 38:1 46:13 77:13 touch 22:18 tough				

51:9	wealth	56:23	winning	writing
vendor	9:19 19:25	Wilson	19:4	30:9
60:16	29:1	4:7 5:4,9	wins	written
versus	weaponize	6:4 7:1	78:18	13:12 28:5
4:6	27:18	8:3,6	wise	65:11
vibrant	weaponized	10:12,16,19	50:10	wrong
74:18	27:22,23	13:2 14:13,	wished	51:13
view	website	16,20 15:18	61:22 76:5	64:11,13
24:15 34:20	16:16	18:21,25	withdrawal	76:12
views	19:12,16	19:6,25	79:1	wrote
33:11,14	60:13,17	20:3,9,10,	withdrawn	6:21 8:12
Vladimir	66:16,18,	13,19 21:19	78:22	12:18 14:23
37:19,23,25	19,20 67:10	26:17,18	Wizard	26:18 49:25
39:14 41:21	Wednesday	35:15 36:24	42:14,19,24	
46:12 58:24	82:8	38:21,22	43:6,9	X
73:13 77:7,	well-	42:13 47:15	70:11	Xi
9	established	48:22 49:4	word	43:22
voice	71:7	58:15 60:21	31:5 74:24	
19:20	well-formed	62:15,25	words	Y
	63:20	63:10 64:8,	38:12 42:22	
W	well-known	15,22 65:5	work	year
	21:2 66:5,6	66:4 68:6,	82:3	53:5
waive	68:6	23 69:21	worked	years
79:6	well-pled	70:10 72:3	34:21 49:12	37:15 38:16
waived	53:14 59:19	73:8,11,15,	working	York
79:10	whatsoever	24 74:9,23	39:6 43:21	12:14,25
waiving	54:4	77:23 82:4	46:12	18:11,12
5:11,15	Whisenhunt	Wilson's	works	20:25 47:4
wanted	4:23,24	12:1,8 15:6	30:20,21	48:1 65:12,
11:25 23:12	27:12 70:7	16:6 26:22	37:17,21,24	16,23 71:10
29:8	79:22	40:7 46:6	39:21 61:21	
wanting	80:12,16	53:7 56:14	77:5,7	Z
55:18	81:14 82:1,	60:10,18	82:1,12	Zoom
Washington	20	62:21 65:12	world	4:14,19
21:1 30:12	White	68:23 69:5	31:4 58:13	82:4,5,16
watch	6:15	70:9 76:1	60:4	
32:7	wide	79:1	worse	
waving	71:9	Wilsons	52:22 71:15	
29:23	widely	58:13	worth	
ways	58:20,21	win	19:7	
16:14	wife	26:1 51:23		
		76:19		